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INTRODUCTION

History will reflect that the National Park Service is a remarkably durable organization. Established 71 years ago to manage a growing system of national parks, it has been constant in carrying out the charge given to the first director, Stephen T. Mather, by Secretary of the Interior Franklin Lane:

First, that the national parks must be maintained in absolutely unimpaired form for the use of future generations as well as those of our own time; and

Second, that they are set apart for the use, observation, health and pleasure of the people.

The National Park Service is the sole federal agency charged with these two responsibilities as its primary mission.

Over the decades these concepts of preservation and use have come under assault, but the mission of the National Park Service has not changed. Even with the addition of new areas, new programs, and new functions it has been successful in reconciling conflicts between preservation and visitor use. The Service has successfully adjusted its organizational structure to meet the impacts of social, technological, budgetary, and legislative change.
Once again the National Park Service has been challenged. There is growing concern in some sectors of the federal government that continuation of the current organizational structure and policies of the National Park Service dilute the effectiveness and efficiency of the agency. There is concern that elements of politics and special interest have crept into the National Park Service and have begun to drive the organization to the detriment of field operations designed to serve the public and to protect the resources.

The Organizational Structure Task Force was appointed by the director of the National Park Service to propose a management and organizational structure that will not only be responsible to the interests of efficiency, effectiveness, and economy, but also ensure that the Service fulfills its basic mission in 1991 (its 75th diamond anniversary) and beyond.

The task force was divided into four work groups that examined administrative programs, operational programs, technical service centers and external programs, and the structures, roles, and functions of the Washington and regional offices. Convened in January 1987, the task force members conducted personal interviews with program managers, reviewed files, and prepared a questionnaire for completion by parks and regional offices to help identify recommendations for improved line management oversight and support to parks.

The process of institutional change initiated by the 12-Point Plan will be strongly reinforced by the recommendations of this task force. Our
objectives should not be confused with those of the Year 2000 Task Force, which is responsible for predicting future demographic, social, and economic trends and interpreting their impacts on the future operations of the National Park Service. The charge to the Organizational Structure Task Force is to look at the whole of the organization and to recommend how the human and monetary resources available to it can be most effectively put to work in support of field operations to meet the challenges of the future.

It is our strong conviction that success or failure of the task force recommendations rests heavily upon the ability of the Service and the Department to develop and agree to implement a meaningful plan for automatic data processing and information systems management. New hardware, new software, and system-enhancing procurements and training are vital to the operation of the National Park Service and are the keystone to the future efficient management of the national park system.

The Task Force recommendations are compiled at the front of the report, accompanied by statements illustrating their worth in terms of saving funds or full time equivalencies, or in terms of improving support services to parks. Analytical material assembled to drive and support the recommendations was summarized and appears in the second section of the report. All other backup material has been assembled as an archive and will be cataloged, indexed, and retained for future use.
TASK FORCE OBJECTIVES

Improve the line management and support to parks by redefining the roles and functions of the Washington, regional, and technical service units of the National Park Service.

Determine what program activities are needed at what levels to adequately support the field units in the conduct of administrative programs, operational programs, and technical services/external programs.

Determine the most effective distribution of resources among the various organizational units.

Review regional organizational structures and boundaries with respect to span of control, staffing ratios, and workload balance.

Reallocate savings derived from management and organizational improvements to the field units.
ORGANIZATIONAL CHANGE

1. Implement a process for analyzing and responding to change as an integral part of the management system. Make the Denver Service Center Statistical Unit or another appropriate office responsible for gathering and analyzing technical data and forecasting change. When organizational change is indicated, convene a task force to involve all levels of the organization in formulating recommendations.

The task force identified the need for institutionalizing a two-phase process for organizational change. The two phases of data analysis and recommendation formulation could be separated as described below.

Proper organizational analysis requires data, time, and personnel. Much, if not all, of these data are currently available from various sources within the Service. However, this information is not readily retrievable, and what can be retrieved is often inconsistent. The DSC Statistical Unit could routinely collect and update this information, analyze it, and report significant findings to the Directorate. It could also serve the needs for such data from all parts of the organization, and in particular support the servicewide planning and design activities of the Denver Service Center. By constantly monitoring funding and staffing levels, visitor use
statistics, socioeconomic data, and major environmental issues, the unit could help forecast changes in visitation, workload imbalances, resource management priorities, and so forth, and indicate areas of NPS responsibility that might be expected to change significantly in future years. The role of the statistical group would end with advising the Directorate of significant findings that might affect the organization or staffing of the Service.

Recommended changes would be developed by a task force convened for that purpose. The task force approach to dealing with organizational change is well founded. Whatever the scope of future changes, it is important that all levels of the organization be involved in the process of deciding what changes will be recommended to the director. The success of any reorganization will certainly depend upon the degree to which affected employees have been allowed to participate in the process.
ROLE AND FUNCTION
OF THE WASHINGTON AND REGIONAL OFFICES

1. Reaffirm the policy-making role and function of the Washington Office.

The current roles and functions of the Washington Office and the regional offices are well stated, and there is no apparent reason for change. The Washington Office supports the director of the National Park Service in planning, guiding, and controlling all Service activities within prescribed congressional and departmental policies, regulations, and procedures. The director and supportive Washington Office staff are responsible for the development of NPS policies, programs, regulations, and procedures.

2. Reaffirm the regional office's primary role and function of providing support to parks and management oversight.

Span of control issues and the need for constant communications on a variety of subjects have made the regional office structure an integral part of the NPS management process. Appropriate functions of regional offices include establishment of regional priorities, resolution of regional issues, consolidation of information needed at the regional and Washington levels, and
development of the staff expertise required by the various parks. The efforts of the Service to evolve into the most efficient organization for protecting resources and delivering visitor services should be directed toward maintaining a decentralization of decision-making authority while centralizing support processes for efficiency.

3. Defer centralization of support functions until the ADP systems needed to process servicewide programs are developed.

Data processing in the Service has become fragmented and heavily decentralized. The result is a proliferation of incompatible software and hardware, duplication of efforts in programming, and no improvement in communication. It is time to streamline and standardize the Service's ADP systems. Caution is urged not to consolidate ahead of the development of these systems.

4. Remove operational offices and programs from direct Washington Office supervision.

Direct supervision of operational programs is not consistent with the primary role and function of the Washington Office and removes programs from established decision-making channels for priority-setting, funding, scoping, and project review. The offices at question include the divisions of Air Quality, Water
Resources, and Geographic Information Systems, the Branch of Mining and Minerals, and the Office of Operations Engineering. These offices are addressed in greater detail in the "Technical Service Centers and External Programs" section of the report.

5. Realign the ten geographic regions to help balance the workload and to reflect cultural and socioeconomic conditions.

The workload represented by the numbers and complexities of parks under each of the ten regional offices varies widely from region to region. This imbalance is addressed in the following realignment recommendations.

Arizona to Southwest. This was suggested in questionnaire responses based on the cultural similarities of the southwestern areas and the current sociopolitical situation. This recommendation also recognizes the fact that Arizona parks are currently administered by two regions. The change will significantly increase the workload in the Southwest Region. The transfer of Grand Canyon to the Southwest Region will place the Colorado River drainage into three regional office jurisdictions. However, this will not be too much of a hindrance since the Service is not a water-management agency. Fifteen parks, 425 FTEs, and $12.6 million are involved in this realignment option.
Louisiana to Southeast. This change is recommended because the cultural resources and socioeconomic conditions are associated with the South more than the Southwest. Also, Jean Lafitte (the only NPS unit in the state) is much closer to Atlanta than Santa Fe. The state includes one park, 48 FTEs, and a $1.8 million program.

Kentucky to Midwest. Midwest is low on NPS units served, and Kentucky is closely tied to the Ohio Valley socioeconomically. This proposal will also consolidate the Lincoln sites in the same region. Kentucky is much closer to Atlanta than to Omaha, but the opportunity to help balance the workload and the similarity of resources and socioeconomic conditions offsets this consideration. The state of Ohio is farther east than Kentucky and is served by Omaha. These two states will be located farther away from their regional offices than most. Three parks, $4.0 million, and 165 FTEs are involved in this option.

Montana to Pacific Northwest. Glacier is the largest workload factor under this option, and it is geographically closer to Seattle than to Denver. The socioeconomic conditions are split. Western Montana seems to be oriented toward Idaho and Washington, and eastern Montana relates to the Great Plains and Rockies. Seattle will be a more efficient office with the addition of $7.5 million in field
operating dollars, 246 FTEs, and five more units to support. The negative aspect of this transfer will be the separation of closely related resources and management programs, such as the program of the Interagency Grizzly Bear Group, which is concerned with grizzly bear habitat in the entire Rocky Mountain Region, including Montana. Also, Glacier represents the northern extension of the Rockies ecosystem.

Antietam, Harpers Ferry, and Manassas to Mid-Atlantic. This realignment was suggested in response to the questionnaire. The Civil War areas will be more regionally concentrated, and the inclusion of Harpers Ferry will put all the parks in West Virginia into one region. This option will greatly increase the distance of these parks from the regional office. The realignment will shift 109 FTEs and $3.0 million to the Mid-Atlantic Region. The myriad of permits, cooperative agreements, and political involvements at Harpers Ferry will require considerable support from the Mid-Atlantic Regional Office.

The recommended boundary adjustments can be made with no transfer of regional office staffs. The regional offices receiving new parks will still have a more favorable ratio of staff to workload than the regions losing the parks. Projections of visitor use to the year 2020 indicate that changing use patterns will not affect the relative workloads in the future.
The regional offices affected by boundary recommendations will have to negotiate the transfer of pooled funds, such as cyclic maintenance, natural science programs, property replacement, etc.

More efficient operations resulting from a better-balanced regional workload will offset the costs of carrying out the recommendations. However, it must be recognized that expenses associated with staff travel for orientation, coordination between regions, public/congressional relations, and moving files will be added expenses for a minimum of two fiscal years. These expenses were difficult to estimate, but it is suggested that the Service set aside $250,000 for this purpose. The changeover would be made at the end of the fiscal year. A minimum of three months would be required for planning the transition.
Number of Parks
National Park Service

- Current
- Alternative
- Preferred Alternative

<table>
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<th>Alternative</th>
<th>Preferred Alternative</th>
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<tr>
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<td>15</td>
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</tr>
<tr>
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<tr>
<td>North Atlantic</td>
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CURRENT REGIONAL BOUNDARIES

National Park Service

June 1987

Alaska Region not affected

Pacific Islands are part of Western Region
RECOMMENDED REGIONAL BOUNDARIES AND AFFECTED STATES
National Park Service
June 1987

Alaska Region not affected
Pacific Islands are part of Western Region
ADMINISTRATION

PROGRAMMING AND BUDGET

1. Retain the programming and budget functions in the regional offices and parks.

Top management must have the best information available when making decisions regarding allocations of funds, and the park superintendent is the key person in the assembly of quality programming and budgetary data. Consequently, the Service must continue to place the programming and budget responsibility with the park superintendent. This important management process does not lend itself to any further centralization without loss of quality and the threat of seriously flawed decisions. The same is true with respect to the regional offices and other intermediary management offices.

2. Review programming and budget processes in the Washington Office to ensure that program priorities and funding allocations are directed by management.

Priorities set by superintendents and regional directors should not be altered by any staff, including the Washington Office staff. Discretionary funds control and priority setting at the WASO level provides the best service to parks.
3. Fully implement the recommendations for consolidating funding sources as developed by the Director's Transition Team.

Unifying the number of fund sources into fewer programs will allow for better fund control and help ensure that the highest priority activities are accomplished each year. Consolidation of program formulation and execution under the assistant director/comptroller will increase competition between programs and surface the highest priorities more rapidly in the budget process.

AUTOMATIC DATA PROCESSING

1. Make parks and regions responsible for developing applications in compliance with WASO standards and policies.

The applications developed in the Washington Office are not meeting the operational needs in the field, and problems are created when parks have to bend operational needs to fit the software. Making the parks and regions responsible for ADP applications (design, testing, implementation, training, and maintenance) will promote higher productivity and also higher morale within the organization. Current system designs stress the importance of building such systems from the bottom up, ensuring the inclusion of what is necessary to accomplish field
work. The Washington Office can still obtain the information it requires without getting involved in the operations aspect of ADP applications and without allowing WASO oversight functions and program needs to drive the system. An "upload" capability can easily be incorporated into applications developed in the field for reporting to the Washington Office. WASO operating programs should be funded and prioritized in a manner similar to other operating programs.

2. Restructure the WASO Information and Data Systems Division.

Support to employees in the field who are accomplishing the workload can be increased by restructuring the management team to foster sharing of resources and responsibilities. Consideration should be given to separating the WASO Information and Data Systems Division into two units: A central cadre would oversee the development of policy and guidelines. This group would have responsibility for managing a servicewide clearinghouse for dissemination of information about the hardware and software being developed and used throughout the Service. Coincidentally, this concept fits almost word-for-word the organizational definition for the Information and Systems Division contained in the Departmental Manual, Part 145, 10.4D, dated January 20, 1987. A second group of information resource specialists would be responsible for coordinating the gathering of servicewide data for a common
data base to meet management needs. This would allow for compliance with the external requirements of the Department, the Office of Management and Budget, and the General Accounting Office.

Once the WASO Information and Data Systems Division was reorganized, the remaining resources plus additional required FTEs could be reassigned to the regions and parks as required by their increased application workload. Organizations that could support full-time ADP personnel to maintain and operate systems should have their own staffs. The WASO offices would function in a manner similar to other users and have their share of the existing personnel.

3. Establish standards for hardware and software and pursue a servicewide procurement for standard elements; should a servicewide procurement not be approved, develop an interim strategy for coordinating and facilitating ADP procurements.

Standardizing ADP procurements to ensure compatibility of equipment and cost savings from volume buys will benefit parks and regional offices by simplifying complex procurement procedures, saving time and money.

4. Develop and enhance a servicewide electronic communications system, incorporating common data bases, that will allow for the free flow of information between all organizational levels.
Applications developed to meet the operational needs of the field and to provide for data entry at the lowest user level will increase productivity at all levels of the organization.

5. Implement a servicewide computer network for personnel and equal opportunity.

A servicewide automated personnel program, with a common operating system, software, and data bases, will facilitate communication throughout the Service and will allow for the streamlining of many functions that are currently performed manually. Once such a system is installed, further review of all personnel and equal opportunity functions can be conducted to determine which can be centralized to achieve greater cost reductions.

CONTRACTING AND PURCHASING

1. Retain level I, II, and III warrants in the parks.

Decentralization of contracting offers the advantages of the shortest possible procurement lead times, familiarity with park problems, and convenience in personally contacting contractors and vendors. Fewer FTEs are required with decentralized procurement, because many park procurement personnel also
accomplish other functions. Each regional office should examine workloads in the parks and recommend changes if the departmental productivity standards are not being met without adequate justification.

2. Centralize level IV warrants at the regional office level.

3. Centralize special procurements such as ADP, telecommunications, and motorized equipment in the Denver Service Center, with staffing based on servicewide workloads.

    Centralization will result in lower costs owing to development of better specifications, volume buys, effective use of performance data, etc.

4. Develop an integrated finance/property management system requiring single terminal input from the purchase order or other originating document.

    Such a system will eliminate property management information entry at two terminals, saving time and improving record-keeping and property inventory information.
1. Implement the Consolidated Finance Office without major redesign of the existing ADP system/program.

The task force recognizes that despite the additional costs, ADP enhancements are inevitable if the information needs of field offices are to be served. However, it is recommend that the Consolidated Finance Office be implemented in the short term without major redesign of the existing ADP system. Many of the needed informational improvements can be implemented after a servicewide ADP system procurement is initiated or after the departmental FIRM system becomes a reality.

2. When a decision is made about the computer mainframe and software for the departmental accounting system, proceed to contract some or all ADP services to another Interior bureau for processing on the departmental mainframe.

Contracting to utilize the technical expertise already developed by other bureaus will be less costly in the long term than attempting to develop an in-house ADP system capability.

3. Reevaluate the relative advantages and disadvantages of alternative locations for the Consolidated Finance Office.
Although Reston, Virginia, is the location selected for the Consolidated Finance Office, the task force believes very strongly that other geographic locations, such as Denver, would be more suitable in terms of employee retention, ease of operations, and number of working hours shared with other areas of the country, and would be far more cost effective.

4. Request that the Department waive any requirements to produce certain cost savings and reduce staffing levels as an immediate result of the consolidation.

The Service cannot meet the FTE reduction goals established by the Department by October 1, 1988. However, when the FIRM accounting system goes into effect, or when a servicewide ADP procurement is approved, the Service can conceivably reduce its staffing levels to the 165 FTEs mandated by the Department.

PERSONNEL

1. Retain the current structure of the classification function while increasing the development and utilization of computer applications.

The current structure of the classification function is considered the most efficient, given the unique nature of the National Park Service (i.e., the diversity of functions in widely
scattered field locations). However, significant efficiencies can be achieved through increased development and utilization of computer applications. The suggested approach is that a pilot region be designated to develop a comprehensive system of computer applications and then make these available to other regions for implementation of specific programs.

2. Retain the existing structure of the recruitment and staffing function.

The current level of staffing delegations has been worked out over the years in response to park and regional needs and capabilities and is well understood by the managers served. According to the responses to the questionnaires, the regions prefer a continuation of current practices, whereby each region is free to determine what delegations it can redelegate. No strong arguments exist to change the level or nature of the existing delegation authority.

The regions should continue to conduct their seasonal recruitment for laborers as best fits their needs. Peripheral problems such as candidates not understanding how to apply in the various regions are best addressed by providing better information to candidates rather than by forcing a servicewide approach. Because seasonal ranger recruitment is already centralized, that process should remain as is, but strong
consideration should be given to addressing the concerns identified with it, including the costs, the law enforcement qualifications issue, the problems inherent in application forms, and the acceptance of incomplete, late, and other problematic applications.

3. Ensure that payroll issues are addressed at a high enough level in the regional offices to prevent problems or resolve them at an early stage.

EMPLOYEE DEVELOPMENT

1. Establish the training and employment development function directly under the associate regional director for administration.

Washington has recently reorganized this function to place greater emphasis on employee development to meet management objectives and prepare the Service for the future. Some regions have no training officer at all, while in others the position serves as a clearinghouse for training opportunities. Greater emphasis on the developmental aspects of this role will ensure responsiveness to organizational needs.

2. Further address the role, function, organizational alignment, and operation of the training centers.
The task force did not have the time to analyze these centers and their functions, but managers expressed significant concerns about their status, curricula, administrative procedures, and whether they are meeting the needs of the Service.

3. Realign the membership on the Training Development Review Board to increase field representation.

There is a need for more field input into training allocations and into curriculum development, which can be accomplished through participation on the Training Development Review Board. Two or three superintendents and several regional representatives should participate on the board through two-year rotational assignments. It is further recommended that this board become much more active.

4. Establish a servicewide position numbering system.

A common servicewide system will provide for consistency and ease of identification of positions among regions. This will facilitate analysis of numbers of permanent and temporary employees, FTEs, and other statistical information tied to the budget process.
1. Decentralize investigation and adjudication of EO complaints to the regional offices.

Decentralizing investigation and adjudication to the regions will allow more timely settlement of complaints and may result in reduced payments on settlements. Fewer complaints will be lost merely because of length of processing. Regions do not currently have the funding and FTEs needed to satisfactorily accomplish this function, and these resources must be transferred to the regional level along with the function.

2. Have regional EO managers report directly to the regional directors.

Budgets and FTEs are allocated to each regional program by the regional directors. Regional directors are also directly responsible for the failure or success of the program. EO managers should report to the regional directors regardless of whether or not the investigation and adjudication process is decentralized.
OPERATIONS

MAINTENANCE

1. Review the DSC maintenance support function for possible restructuring in light of the maintenance management system once a sufficient data base has been established.

   Keeping the Denver Service Center up to date with the maintenance management system will benefit the parks by ensuring a more systematic and faster response to their changing needs for maintenance assistance.

2. Institutionalize the concept of visual quality in planning, repair, and maintenance of park facilities and grounds.

   Improved service to the public is the bottom line. The Service is the premier agency in resource-compatible landscape architecture, and the appearance of the parks should reflect this quality and pride. The public should feel that they are in a very special place, and it takes commitment to details at all levels of the organization to create this atmosphere. The concept of visual quality can be promoted through training, management direction, evaluation, and guidelines, such as NPS-70.
1. Retain the existing organizational structure.

   The reestablishment of an assistant director for interpretation in the Washington Office increases the management emphasis on interpretation and more specifically on helping the parks provide quality interpretive services to visitors. Supervision of the Harpers Ferry Center by the assistant director will improve project coordination, priority-setting, and allocation of resources to parks. Collaborative relationships with the divisions of natural and cultural resources, visitor services, maintenance, and training will strengthen the direction and oversight of the interpretation function at the national, regional, and park levels.

2. Increase emphasis on joint interpretive programs with other federal land-managing agencies and local and international conservation and recreation organizations.

   Jointly operating visitor information centers with neighboring agencies offers the obvious benefits of savings in construction, maintenance, and personnel. Visitors also benefit from having a single source of information about resources and recreational opportunities. Marketing, in terms of getting advance information to potential visitors, requires cooperation with
concessioners and international and national travel agencies. Getting better information to visitors before they arrive reduces impacts on the resources and facilitates park operations. Advance information also enhances the likelihood that special populations will have the same quality experience as others.

3. Manage special-emphasis programs so that they contribute to meeting the major annual objectives of interpretation.

Special emphasis programs often are not accompanied by resources to carry them out. Nonetheless, when such initiatives can be keyed to the management needs and objectives of particular parks, and funded accordingly, interpretation can be strengthened, and the programs of an individual park can benefit the entire system.

4. Implement a visitor-mapping program.

A visitor-mapping program could be initiated by selecting 20 parks representing a statistically valid cross section of the park system. Visitor mapping at these indicator parks could be accomplished on a two- or three-year cycle, and the data could be used to identify trends and formulate projections for the entire system. Eventually visitor mapping could be included in the advance planning cycle for all major construction projects. The parks would benefit from an improved capability to plan for
future visitor services and interpretation based on projected visitor needs. This program should be the responsibility of the Denver Service Center Statistical Unit under whatever supervision is determined by Washington.

5. Increase contact and associations with local, regional, and national organizations that deal with concerns of minority and ethnic groups.

Fostering a greater awareness of the interests and needs of various segments of the population will help ensure that all visitors enjoy and learn from their visits to the parks.

RANGER ACTIVITIES

1. Reevaluate the departmental policy requiring at least 40 hours of in-service training each year for law enforcement personnel. (Departmental concurrence will be necessary to initiate the evaluation.)

The current training program might be less cost-effective than one of the alternatives, which include training law-enforcement rangers every other year for a block of 40 to 80 hours, providing several one- or two-day seminars that would total 40 hours over the course of a year, and reducing the annual requirement based on individual skills and need for information.
1. Conduct an in-depth review of the science program organization and budget and its relationship to the natural resource management program.

The Service needs to clarify who has responsibility for certain programs and better coordinate the priorities of air and water quality research and wildlife research. Organizational changes may be necessary. At a minimum, effective communications must be established between science, resource management, and operations. This issue should be addressed by the pending blue-ribbon panel, with participation by outside consultants such as the National Academy of Sciences.

2. Include the social science program in the NPS research program.

The WASO role in social science is one of oversight and guidance. The actual work and implementation should be through a system of servicewide priorities. Social science is closely tied to visitor needs and demands for services. Its placement in operations will clarify functional relationships between the science staff and those in visitor services, concessions, interpretation, history, and protection.
CULTURAL RESOURCE MANAGEMENT

1. Establish a formal ethnography program in those regions most affected by the need to understand and manage the resource and program issues associated with native Americans and other minority groups.

   This program can be initiated as a pilot project in two or three regions. The Native American Indian Religious Freedom Act of 1978 should serve as a guide for the program and provide the basis for organizational structure.

2. Decentralize the Cultural Resources Preservation Fund.

   Funding levels for regions should be approved by the director, but priorities for projects should be determined by the regional directors.

SAFETY

No recommendations. See the analysis in part two of the report.

CONCESSIONS

No recommendations. See the analysis in part two of the report.
WASO FIELD OFFICES

General

1. Consolidate the WASO field offices (Air Quality Division, Water Resources Division, Geographic Information Systems Division, Branch of Mining and Minerals, and Office of Operations Engineering) into a new Division of Resource Services reporting to the manager of the Denver Service Center.

Consolidating the resource service divisions in the Denver Service Center will be conducive to establishing a servicewide priority-setting process for those services similar to the center's priority-setting process for planning, design, and construction work. The Denver Service Center is well coordinated with the management processes of the Service. Its responsiveness to top management and experience in working with a servicewide priority process makes it a logical place to put those operational offices currently under the Washington Office.

Relocating the resource service divisions from the Washington Office to the field is consistent with the role and function of the Washington and field offices.
2. Consider funding alternatives for long-term research programs.

Parks with long-term resource monitoring needs should fund them directly as part of their base funding. Data interpretation could be obtained through contract with offices in the Resource Services Division, cooperative park study units, or other government or private sources.

Air Quality Division

No specific recommendations.

Water Resources Division

1. Relocate the office to Denver.

The costs of moving the Water Resources Division from Fort Collins to Denver are estimated to be approximately $500,000. It is recognized this office will be disrupted by moving. However, the long-range benefits of being near the Rocky Mountain Regional Office, the Denver Service Center, and other related resource offices outweigh the short-term problems associated with moving.
2. Eliminate the Applied Research Branch.

This branch does not consist of a "critical mass" of employees, and savings can be made in management and administration. Programmed research activities and assigned personnel should be transferred to one of the remaining branches, and the rest of the research should be contracted for as needed. The 1987 budget for this branch was $427,300, with an additional $181,000 available for projects.

Geographic Information Systems Division

1. Encourage greater use of GIS technology in the development of a scientific basis for well-reasoned decisions in natural resource, cultural resource, fire operations, and maintenance management.

The office can demonstrate operational use of GIS data bases for new servicewide applications, including lost-hiker search-area identification, interpretive displays, maintenance, potential habitat identification, and archeological site location. The development of an in-house scan-digitizing capability should be evaluated, since the cost of contracted digitizing is one of the factors that makes GIS development hard to afford for many parks.
Office of Operations Engineering

1. Reevaluate the consulting engineering function.

The small (four-person) Consulting Engineering Branch cannot effectively provide engineering assistance to the entire Service. The branch should either be limited to policy formulation (eliminating technical maintenance assistance to the field), or the branch should have its assistance capability expanded by adding other engineering disciplines, such as a safety engineer and a soils engineer. An in-depth study is needed to determine if additional centralized services in engineering and related fields would be cost-effective. If the branch is limited to policy formulation, it should stay in the Washington Office. If it remains a technical service office, it should transfer to the new Division of Resource Services.

Mining and Minerals Branch

1. Ensure that all future park planning includes the mineral rights issue as an integral part of the planning process.

General management plans and resource management plans rarely discuss mineral development activities outside the park boundaries, even though they can have significant impacts on
park resources. Most units where mineral development is taking place need to develop mineral management plans.

DENVER SERVICE CENTER

1. Retain the center as currently organized.

A centralized service center for planning, design, and construction offers the advantages of continuity of workflow from new area study, through general management planning, through design, to construction. It achieves better utilization of professional manpower and funds by facilitating shifts in personnel to reflect shifts in national program emphasis. And it creates some separation between park and regional managers and planning and design professionals. The Denver Service Center is operating effectively. Numerous audits and other investigations over the past eight years have found no serious deficiencies, and all the recommendations have been implemented. Three-fourths of the parks and two-thirds of the regional offices that commented on the questionnaire expressed satisfaction with the services they received from the center. The alternative of disbanding the Denver Service Center and relocating the planning, design, and construction functions to the regional offices would not be cost effective. It has been estimated that it would take as long as 19 years to recover the costs of such a move.
Whether or not the recommendation to consolidate the WASO field offices into a Division of Resource Services within the Denver Service Center is implemented, the task force felt it timely to endorse an image change from the development era to one of resource conservation and service by expanding the Denver Service Center into more than a planning, design, and construction organization.

2. Relocate the Williamsport Preservation Training Center to the Harpers Ferry Center and establish strong ties between it and the Mather Training Center.

The present facilities at the Williamsport center do not meet OSHA standards and need to be replaced. Relocating the Williamsport facility to the nearby Harpers Ferry Center will have the following advantages: (1) a good site is available, (2) the center can be served by Harpers Ferry Center administrative and contracting personnel, (3) the center will be convenient to the Mather Training Center. Since the Williamsport Center is both a training center and a project center, it will most appropriately be attached to a project office like the Harpers Ferry Center; however, it should have strong ties to the Mather Training Center. The move will transfer 15 FTEs from the Denver Service Center to the Harpers Ferry Center.
HARPERS FERRY CENTER

1. Retain the center as currently organized.

A centralized service center for interpretive planning and design offers similar advantages as other centralized planning and design offices: continuity of workflow, maximum utilization of professional manpower across regional boundaries, and some separation between managers and planning and design professionals. Although the park responses to the questionnaires indicated approximately equal satisfaction with the Harpers Ferry Center and the Denver Service Center, the regional office responses indicate less satisfaction with the Harpers Ferry Center (four regions indicated they were satisfied, and three indicated they were dissatisfied with the Harpers Ferry Center's services). The center has a large backlog of major rehab work and appears to still be having problems with accountability, annual programming, and priority setting. However, the center is taking positive steps to resolve these problems. Among the actions being implemented are

- a move to contract for all types of design and production work
- increased use of ADP applications
increased communication and coordination with the regional offices and the Denver Service Center through workshops and staff assignments (including the assignment of the deputy manager, Harpers Ferry Center, to a duty station at the Denver Service Center for the purpose of coordinating activities between the two centers)

intensive review and revision of all phases of the center's operations

development of a systemwide priority-setting process for a multiyear program, which will allow priorities for major rehab projects to be sequenced with the existing systemwide construction program

2. Assist the center in addressing the large backlog of major rehab work.

It is currently difficult for parks to plan for interpretive media because planning and production may be scheduled then delayed for years. Assuming the center can increase its production and bring more discipline to its program, this problem should be resolved in the future, and the parks should be better served.

The Service needs to address the large backlog of interpretive facility rehab work. Harpers Ferry Center currently estimates
that the backlog could be retired within 15 years with a program increase of $1 million per year and 15 FTEs to be phased in over a three-year period. This assumes there would be no significant increase in the line-item construction program. The center also needs to increase its general contracting capability.

ARCHEOLOGICAL AND CULTURAL RESOURCE PRESERVATION CENTERS

General

1. Consider the establishment of an archeological center that would incorporate the Northeast Archeology Team.

The center could be organized similar to the Midwest Archeological Center as a unit of one of the regional offices but serving all three regions (North Atlantic, Mid-Atlantic, and National Capital). With resources not expected to increase and the emphasis being given to creating usable resource inventories, it is reasonable to have a consolidated core of professionals able to provide for both general survey work and specific construction-related mitigation work. Close ties with the universities that have provided support in each region would continue. The regional archeologist would still be located in each region and be responsible for developing the archeology program.
2. Establish a second historic preservation center in the Western Region.

The North Atlantic Historic Preservation Center is a good servicewide model for technical support for preservation of historic resources, including the maritime resources in the Western Region.

3. Establish other museum collection storage and conservation centers similar to the Western Archeological and Conservation Center.

The service currently possesses some 25.5 million museum objects. Of these, 68 percent are archeological, 24 percent are archival, and 8 percent fall into a variety of categories such as biology and geology. Only 12 percent of these objects have ever been cataloged. This means that 88 percent, or 22.4 million objects, are still awaiting cataloging. Lack of proper storage and conservation is the primary cause of poor condition in the museum objects. Additional depositories like the one at the Western Archeological and Conservation Center will help manage and protect the Service's cultural and natural collections.

The Western Archeological and Conservation Center is an efficient and practical facility for caring for NPS collections. Similar centers should be established to serve parks with
climatological and cultural similarities, since objects are best preserved in climates similar to those from which they come. Each center will have approximately 5 FTEs. Parks will benefit from having full professional services in curation and object preservation and adequate secure storage for collections. Many small parks will be relieved of major collection storage responsibilities, and regional curators can devote more time to training, exhibit preparation, resource preservation, and collection management plans.

4. Conduct an in-depth workload operations evaluation of all the archeological centers by the same personnel at the same time.

Currently the archeological and preservation centers do not have parallel organizational structures, and the roles and functions of their component divisions overlap, leading to loss of efficiency and economy of operations across the Service. Historically operations evaluations have been conducted by different evaluators, and this has prevented direct comparisons of the efficiency of individual centers.

5. Streamline section 106 procedures.

Procedures can be streamlined using maintenance management system formats adapted from historic structure preservation guides. Where these do not now exist, consideration should be
given to their development under contract. Hand-copied maintenance system formats adapted from historic structure preservation guides can be submitted to state historic preservation officers. Work that follows the prescribed format should not require XXX forms, which will expedite the work in parks. Additional options for improving service to parks would be for parks to use summary inspection forms and file composite XXX forms that refer to maintenance system specifications and other documentation or to develop universal activity lists for parks and utilize blanket XXX forms for restricted maintenance activities.

Western Archeological and Conservation Center

1. Designate the center as a conservation center (museum collections repository) only; move the archeological and various other functions to the Southwest Region.

Not all the archeological staff should be moved. Three or more archeologists will still be needed for contract supervision, compliance, and field assistance. These positions should be transferred to the Western Regional Office to expedite service to the parks. Consolidation of archeological functions will free up some FTEs for reassignment to parks dedicated to cultural resource management. It is not the intent to increase the
staffing and funding of the Southwest center. Contracting and other methods should be implemented to streamline staffing. Relocation costs could be as high as $350,000 if 22 FTEs are relocated, but relocation could be phased.

2. Increase use of the Museum Collections Repository by the Western, Southwest, and Rocky Mountain regions, in accordance with WASO Special Directive 85-4.

This facility provides efficient, cost-effective storage and eliminates the need to create secure environmentally controlled facilities in the field. Shifting curatorial care and preservation of collections from the regional offices to the center will provide the opportunity for regional curators to play a stronger coordinating role with field researchers in collection management and with cooperating institutions caring for special collections. More time will be available to work with parks on collection management plans, scope of collections statements, security systems, environmental controls, training, and collection condition surveys.

3. Move the Division of Administration functions to the Southern Arizona Group Office, retaining an administrative technician and a clerk at the Western Archeological and Conservation Center.
Centralizing the administrative functions in the Southern Arizona Group Office may eliminate two FTEs (personnel specialist and budget specialist) currently allocated to the center.

Southwest Cultural Resources Center

1. Transfer some collections and some curatorial responsibilities to the Western Archeological and Conservation Center, as provided for in WASO Special Directive 85-4.

   Regional curators will have more time available for training, management services, etc., which should benefit parks. It is unlikely that FTEs would be affected.

2. Identify more cost-efficient storage methods for archeological resources, such as returning nonessential materials to the parks for marked below-ground storage.

   An overall reduction in the collections in the regional office or in the center may provide space for other activities and time to accomplish other functions. Savings may be realized by not having to contract for temperature- and humidity-controlled storage for many types of stable materials with limited value. Those collections with high research potential, high intrinsic or
heritage value, unique characteristics, or ownership problems should receive curatorial care on site or be sent to the Western Archeological and Conservation Center. The Chaco Collection and the Kidder Collection will remain intact at their present locations.

**Midwest Archeological Center**

1. Retain the center with no change.

   Approximately 60 percent of the center's work is located in the Rocky Mountain Region, so theoretically it would be more efficiently located in Denver, where it could interact easily with the regional office and the Denver Service Center. However, moving the center would result in considerable direct costs. The present benefits received from association with the University of Nebraska would be lost until new relationships could be developed. For these reasons, moving the center does not appear to be in the best interests of the Service.

2. Place the Midwest Archeological Center under the supervision of the associate regional director to parallel the organizational structure of the other centers.
Southeast Archeological Center

1. Retain the center in Tallahassee pending the completion of the proposed operations evaluation of all the archeological centers.

The proposed evaluation should consider the alternative of combining the Southeast Archeological Center with the Southeast Cultural Resource Preservation Center and relocating them to the regional office in Atlanta. The Southeast Archeological Center appears to be top heavy with five GS-13s on the staff. This also needs to be addressed in the upcoming study.

Southeast Cultural Resource Preservation Center

1. Relocate the regional cultural resource staff from the Chattahoochee center back to the regional office in Atlanta.

This will improve communications and program coordination between the cultural resource management program and the other park operations programs of the Southeast Region.

Approximately 12 FTEs will be transferred from the center to the regional office. Relocation costs will include new office space rental and moving of office furnishings.
2. Retain a small shop operation at the Chattahoochee center or another location at the discretion of the regional director.

North Atlantic Historic Preservation Center

1. Establish a "board of directors" made up of representatives from the North Atlantic and Southeast regions to establish priorities for project work.

Projects in parks in both regions will benefit from a cooperative priority-setting effort enabling the highest priority work in each region to be accomplished.

BRANCH OF FIRE MANAGEMENT, BOISE INTERAGENCY FIRE CENTER

No recommendations. See the analysis in part two of this report.

COOPERATIVE PARK STUDY UNITS

1. Increase the use of CPSUs as vehicles for obtaining research data and natural and cultural resource inventories, but ensure that all NPS-funded research is in direct response to needs set forth in approved resource management plans.
CPSUs offer numerous benefits that might not otherwise be available to many parks, such as scientific peer interaction and access to the diverse expertise of numerous scientists. However, each regional director should ensure that scientists receive adequate supervision so as not to become isolated from the problems that exist in the parks. NPS managers and science professionals must identify needs for high-priority, park-related, applied-research projects in the resource management plans, and CPSU leaders must be aware of and responsive to these needs. CPSU research administrators should be exempt from the Research Grade Evaluation Guide.

Some cooperative agreements with small regional organizations are currently in effect for archeological work. They have produced professional results and been cost effective to administer. Such agreements should be explored for other areas of cultural resource management.

Consideration should be given to placement of CPSUs in specific parks.

NATIONAL REGISTER PROGRAMS

1. Retain centralization of the HABS/HAER program, but continue to give the regions the option of recording structures in cooperation with the Washington Office.
The regions strongly hold that the program should be decentralized. However, the centralized program is more cost-effective, given the limitations on personnel and financial resources, the reliance on donated and reimbursable funding, and the focused professional attention required to develop, staff, and supervise the summer projects. There is no reason to change the current organization until the extent of the reduction in the tax workload is known. There is a need, however, to allow for a regional recording program conducted at the discretion of the regions with available resources. The Washington Office could provide the necessary training. The task force recognizes that this is contrary to the proposed role and function of the Washington Office articulated at the outset of this report.

2. Focus additional attention on improving the National Register program planning and coordination to ensure that all aspects of policy and direction coming from four divisions in the Washington Office are clearly understood at the regional level.

Because the National Register program is run out of four divisions in the Washington Office and is consolidated in one division or branch, or at most two, at the regional level, program direction and priority setting can tend to be segmented and confusing if not well coordinated. Regions have identified this as a problem particularly with the national historic
landmark program and the Historic Preservation Fund. Improving work program development and priority setting will reduce this confusion.

3. Further review the situation of overlapping regional boundaries and disproportionate workload distribution within the National Register programs.

Consolidation into five program regions does not allow for the programs to be administered along traditional NPS boundaries. The states in two NPS regions are split, so those regional offices must coordinate with two different program regions. This problem of program coordination could be reduced by analyzing workloads and modifying boundaries so that all the states in each NPS region are assigned to the same program region.

NATIONAL RECREATION PROGRAMS

1. Continue to administer the national recreation programs under the current regional organizational structure of seven regions.

The regional alignment can be reevaluated once the status of the Land and Water Conservation Fund, the funding support for the grant program, and the recommendations of the President's Commission on Americans Outdoors become clear. All national
recreation programs should remain under the same regional alignment as the Land and Water Conservation Fund to ensure good program coordination with state, local, and federal agencies, and the private sector, and to take advantage of efficiencies that can be derived from having a core of professional staff whose expertise can be used to handle different program functions.

2. Combine the trails and cooperative management programs that are now receiving minimal funding, and redirect the resources to other program functions. Assess the various functions of the grants program and the recreation assistance programs to determine if there are any that can be reduced or eliminated, so that resources can be focused on higher priority program activities, such as compliance.

3. Expand the state and local rivers conservation technical assistance program into other regions besides Mid-Atlantic.

This program delivers valuable technical assistance to state and local governments in matters related to river conservation, assessment, and management, and it has the potential for longer term funding. A consolidated program involving three or four regions will allow the Service to capitalize on the expertise and experience that have been gained.
4. Place the national landmarks program within the natural resources organization at the national and regional levels.

The natural landmarks program is involved with the identification and evaluation of biotic communities and geologic features, and thus is closely aligned with the natural sciences. Placement of this program within the natural resources organization will allow for closer coordination and interaction with other programs performing related natural resource preservation functions.
Summary of Recommendations
ORGANIZATIONAL CHANGE

1. Implement a process for analyzing and responding to change as an integral part of the management system.

ROLE AND FUNCTION OF THE WASHINGTON AND REGIONAL OFFICES

1. Reaffirm the policy-making role and function of the Washington Office.
2. Reaffirm the regional office's primary role and function of providing support to parks and management oversight.
3. Defer centralization of support functions until the ADP systems needed to process servicewide programs are developed.
4. Remove operational offices and programs from direct Washington Office supervision.
5. Realign the ten geographic regions to help balance the workload and to reflect cultural and socioeconomic conditions.

ADMINISTRATION

PROGRAMMING AND BUDGET

1. Retain the programming and budget functions in the regional offices and parks.
2. Review programming and budget processes in the Washington Office to ensure that program priorities and funding allocations are directed by management.
3. Fully implement the recommendations for consolidating funding sources as developed by the Director's Transition Team.

AUTOMATIC DATA PROCESSING

1. Make parks and regions responsible for developing applications in compliance with WASO standards and policies.
2. Restructure the WASO Information and Data Systems Division.
3. Establish standards for hardware and software and pursue a servicewide procurement for standard elements; should a servicewide procurement not be approved, develop an interim strategy for coordinating and facilitating ADP procurements.
4. Develop and enhance a servicewide electronic communications system, incorporating common data elements; should a servicewide procurement not be approved, develop an interim strategy for coordinating and facilitating ADP procurements.
5. Implement a servicewide computer network for personnel and equal opportunity.

CONTRACTING AND PURCHASING

1. Retain level I, II, and III warrants in the parks.
2. Centralize level IV warrants at the regional office level.
3. Centralize special procurements such as ADP, telecommunications, and motorized equipment in the Denver Service Center, with staffing based on servicewide workloads.
4. Develop an integrated finance/property management system requiring single terminal input from the purchase order or other originating document.

FINANCE

1. Implement the Consolidated Finance Office without major redesign of the existing ADP system/program.
2. When a decision is made about the computer mainframe and software for the departmental accounting system, proceed to contract some or all ADP services to another Interior bureau for processing on the departmental mainframe.
3. Reevaluate the relative advantages and disadvantages of alternative locations for the Consolidated Finance Office.
4. Request that the Department waive any requirements to produce certain cost savings and reduce staffing levels at an immediate result of the consolidation.

PERSONNEL

1. Retain the existing structure of the classification function while increasing the development and utilization of computer applications.
2. Retain the existing structure of the recruitment and staffing function.
3. Ensure that payroll issues are addressed at a high enough level in the regional offices to prevent problems or resolve them at an early stage.

EMPLOYEE DEVELOPMENT

1. Establish the training and employment development function directly under the associate for administration.
2. Further address the role, function, organizational alignment, and operation of the training centers.
3. Realign the membership on the Training Development Review Board to increase field representation.
4. Establish a servicewide position numbering system.

EQUAL OPPORTUNITY

1. Decentralize investigation and adjudication of EO complaints to the regional offices.
2. Have regional EO managers report directly to the regional directors.

MAINTENANCE

1. Review the OSC maintenance support function for possible restructuring in light of the maintenance management system, when a sufficient data base has been established.
2. Institutionalize the concept of visual quality in planning, repair, and maintenance of park facilities and grounds.

INTERPRETATION

1. Retain the existing organizational structure.
2. Increase emphasis on joint interpretive programs with other federal land-managing agencies and local and international conservation and recreation organizations.
3. Manage special-emphasis programs so that they contribute to meeting the major annual objectives of interpretation.
4. Implement a visitor-mapping program.
5. Increase contact and associations with local, regional, and national organizations that deal with concerns of minority and ethnic groups.

RANGER ACTIVITIES

1. Reevaluate the departmental policy requiring at least 40 hours of in-service training each year for law enforcement personnel. (Departmental concurrence will be necessary to initiate the evaluation.)

RESEARCH AND NATURAL RESOURCE MANAGEMENT

1. Conduct an in-depth review of the science program organization and budget and its relationship to the natural resource management program.
2. Include the social science program in the NPS research program.

CULTURAL RESOURCE MANAGEMENT

1. Establish a formal ethnography program in those regions most affected by the need to understand and manage the resource and program issues associated with native Americans and other minority groups.
2. Deentralize the Cultural Resources Preservation Fund.

SAFETY

No recommendations.

CONCESSIONS

No recommendations.
The text contains recommendations and actions for various offices and centers within a federal organization. Here is a structured summary of the key points:

### WASO Field Offices

#### General
1. Consolidate the WASO field offices (Air Quality Division, Water Resources Division, Geographic Information Systems Division, Branch of Mining and Minerals, and Office of Operations Engineering) into a new Division of Resource Services reporting to the manager of the Denver Service Center.
2. Consider funding alternatives for long-term research programs.

#### Air Quality Division

No specific recommendations.

#### Water Resources Division

1. Relocate the office to Denver.
2. Eliminate the Applied Research Branch.

#### Geographic Information Systems Division

1. Encourage greater use of GIS technology in the development of a scientific basis for well-reasoned decisions in natural resource, cultural resource, fire operations, and maintenance management.

#### Office of Operations Engineering

1. Reevaluate the consulting engineering function.

### Denver Service Center

1. Retain the center as currently organized.
2. Relocate the Williamsport Preservation Training Center to the Harpers Ferry Center and establish strong ties between it and the Mather Training Center.

### Harpers Ferry Center

1. Retain the center as currently organized.
2. Assist the center in addressing the large backlog of major rehab work.

### Southwest Cultural Resources Center

1. Transfer some collections and some curatorial responsibilities to the Western Archeological and Conservation Center, as provided for in WASO Special Directive 85-4.
2. Identify more cost-efficient storage methods for archeological resources, such as returning nonessential materials to the parks for marked below-ground storage.

### Midwest Archeological Center

1. Retain the center with no change.
2. Place the Midwest Archeological Center under the supervision of the associate regional director to parallel the organizational structure of the other centers.

### Southeast Archeological Center

1. Retain the center in Tallahassee pending the completion of the proposed operations evaluation of all the archeological centers.

### Southeast Cultural Resource Preservation Center

1. Relocate the regional cultural resource staff from the Chattahoochee center back to the regional office in Atlanta.
2. Retain a small shop operation at the Chattahoochee center or another location at the discretion of the regional director.

### North Atlantic Historic Preservation Center

1. Establish a "board of directors" made up of representatives from the North Atlantic and Southeast regions to establish priorities for project work.

### Branch of Fire Management, Boise Interagency Fire Center

No recommendations.

### Cooperative Park Study Units

1. Increase the use of CPSUs as vehicles for obtaining research data and natural and cultural resource inventories, but ensure that all NPS-funded research is in direct response to needs set forth in approved resource management plans.

### National Register Programs

1. Retain centralization of the HABS/HAER program, but continue to give the regions the option of recording structures in cooperation with the Washington Office.
2. Focus additional attention on improving the National Register program planning and coordination to ensure that all aspects of policy and direction coming from four divisions in the Washington Office are clearly understood at the regional level.
3. Further review the situation of overlapping regional boundaries and disproportionate workload distribution within the National Register programs.

### National Recreation Programs

1. Continue to administer the national recreation programs under the current regional organizational structure of seven regions.
2. Combine the trails and cooperative management programs that are now receiving minimal funding, and redirect the resources to other program functions.
3. Expand the state and local rivers conservation technical assistance program into other regions besides Mid-Atlantic.
4. Place the national landmarks program within the natural resource organization at the national and regional levels.

### Archeological and Cultural Resource Preservation Centers

#### General
1. Consider the establishment of an archeological center that would incorporate the Northeast Archeology Team.
2. Establish a second historic preservation center in the Western Region.
3. Establish other museum collection storage and conservation centers similar to the Western Archeological and Conservation Center.
4. Conduct an in-depth workload operations evaluation of all the archeological centers by the same personnel at the same time.
5. Streamline section 106 procedures.

### Western Archeological and Conservation Center

1. Designate the center as a conservation center (museum collections repository) only; move the archeological and various other functions to the Southwest Region.
2. Increase use of the Museum Collections Repository by the Western, Southwest, and Rocky Mountain regions, in accordance with WASO Special Directive 85-4.
3. Move the Division of Administration functions to the Southern Arizona Group Office, retaining an administrative technician and a clerk at the Western Archeological and Conservation Center.
Background

When the National Park Service was founded in 1916, a headquarters staff of six people (a director, an assistant director, a draftsman, an editorial assistant, a chief clerk, and a messenger) were responsible for molding an effective organization, improving the accessibility and usefulness of the parks, and promoting public support and interest in the new bureau. The 37 parks initially brought into the park system all reported directly to the director.

As the agency grew in size and complexity, additional organizational entities were established. By 1928 the director had assistants for Branches of Operations, Law, and Lands in the Washington Office, while an assistant director for field operations had direct supervision over the parks and Offices of Engineering, Landscape Engineering, and Education and Forestry. More and more emphasis was being placed on managing resources in the field.

The forerunner of a regional office, the Office of the Superintendent of Southwest Monuments, was established in 1931. The first regional offices were established in 1937 at Richmond, Omaha, Santa Fe, and San Francisco. The Richmond office served the southeastern states. The
Omaha office served the states from the Midwest to the Rockies. The Santa Fe office served the Southwest, and the San Francisco office served those states west of the Rockies. By 1937 the Washington Office was divided into numerous branches including Historic Sites, Buildings Management, Research and Information, Plans and Design, Engineering, Forestry, and Memorials. Considerably more functional specialization was present in 1937 compared to just a decade earlier, with separate offices for functions such as safety, water rights, and archeology.

The Service continued the trend toward increased functional specialization during the Mission 66 era. A fifth regional office was added in Philadelphia, and an unsuccessful attempt was made to create a sixth regional office in St. Louis. An assistant director for administration had been appointed in 1951, and by 1956 Branches of Finance, Office Services, Personnel, and Safety were reporting to that assistant director. A second assistant director for operations oversaw the Branches of Concessions, Conservation and Protection, Lands, and Programs and Plans Control. Divisions of Audits, Design and Construction, Interpretation, and Recreation Resources Planning reported directly to the director.

In 1961 the Directorate was divided into five functional areas with assistant directors for administration, public affairs, resource planning, design and construction, and conservation, interpretation, and use. Ranger services and maintenance appeared as organizational entities. The National Capital Region was created.
1928
DIRECTOR
Stephen T. Mather
ASSOCIATE DIRECTOR
Arno B. Cammerer
ASSISTANT DIRECTOR (FIELD)
Horace M. Albright

BRANCH OF OPERATIONS (ASSISTANT TO DIRECTOR)
Arthur E. Demaree

BRANCH OF LAW (ASSISTANT TO DIRECTOR)
George A. Mossey

BRANCH OF LANDS (ASSISTANT TO DIRECTOR)
Washington B. Lewis

CHIEF CLERK
R. M. Holmes

FIELD HEADQUARTERS

NATIONAL PARKS AND NATIONAL MONUMENTS

ENGINEERING
Frank A. Kittredge

LANDSCAPE ENGINEERING
Thomas C. Vint

EDUCATION AND FORESTRY
Ansel F. Hall

1938
DIRECTOR
Arno B. Cammerer (to 8-8-40)
Newton B. Drury (from 8-8-40)

ASSOCIATE DIRECTOR
Arthur E. Demaree

OFFICE OF EDITOR-IN-CHIEF
includes P. Davy

BRANCH OF OPERATIONS

BRANCH OF RECREATION, LAND PLANNING AND STATE COOPERATION

BRANCH OF PLANS AND DESIGN
Thomas C. Vite

BRANCH OF RESEARCH AND INFORMATION
Herbert C. Bryant

ACCOUNTS AND CONTROL DIVISION

PERSONNEL AND RECORDER DIVISION

SAFETY DIVISION

PUBLIC UTILITY SERVICES DIVISION

PARK OPERATIONS DIVISION

C. D. Marshch

BRANCH OF RECREATION, LAND PLANNING AND STATE COOPERATION

BRANCH OF HISTORIC SITES

BRANCH OF BUILDINGS MANAGEMENT

BRANCH OF RESEARCH AND INFORMATION

BRANCH OF PLANS AND DESIGN

BRANCH OF ENGINEERING

BRANCH OF RESEARCH AND INFORMATION

BRANCH OF FORESTRY

BRANCH OF MEMORIALS

JOHN J. Vogt

NATIONAL PARKS, NATIONAL MONUMENTS AND OTHER AREAS ADMINISTERED BY THE NATIONAL PARK SERVICE

NATIONAL CAPITAL PARKS
C. M. Marshch (to 1-1-39)
France F. Cabin (to 1-1-43)

REGION I
Richard. Virginia

REGION II
Central, Northwa

REGION III
Santa Fe, Poni Mioi

REGION IV
San Francisco, California

NATIONAL PARKS, NATIONAL MONUMENTS AND OTHER AREAS ADMINISTERED BY THE NATIONAL PARK SERVICE

NATIONAL PARKS, NATIONAL MONUMENTS AND OTHER AREAS ADMINISTERED BY THE NATIONAL PARK SERVICE

NATIONAL PARKS, NATIONAL MONUMENTS AND OTHER AREAS ADMINISTERED BY THE NATIONAL PARK SERVICE

Administrative History: Expansion of the National Park Service in the 1930s (1982) p. 333 notes this was organization effective 8-1-38 although reference chart carries a date of 10-1-38.

Although shown on charts in black block was in reality a hypothetical organization to denote physical location outside Washington, D.C.
By 1972 a seventh regional office had been established in Seattle, and the headquarters of the Southeast Region had been relocated from Richmond to Atlanta. The eastern and western Offices of Design and Construction had been through severe reorganizations, finally culminating in the consolidation and centralization of their operations at the Denver Service Center.

The mid to late 1970s brought about significant changes in the field organization of the National Park Service. Two additional regional offices had been created, one in Denver and the other in Boston. In the Washington Office, the functional approach to organization was further refined by consolidating park operational functions under the associate director for management and operations. Other associate directors were in charge of administrative services and preservation of historic properties. Staff offices to the director included the Offices of Legislation, Equal Employment Opportunity, and Programming and Budget. A Data Systems Division was included in the organization for the first time.

The early 1980s reflected the final significant changes in the role and functions of the Washington and regional offices. A tenth regional office was established in Anchorage. The Heritage Conservation and Recreation Service functions, formerly removed from the National Park Service, were reinstated and subsequently consolidated with previously existing functions under associate directors for archaeology and historic preservation and for recreation resources. A parallel associate director for science and technology had been appointed in the late 1970s.
Current Status, Resources, and Organizational Requirements

The current organization of the National Park Service was implemented on February 16, 1987 (see the attached organizational chart). Regional and park organizations vary from the Washington Office organization to reflect the specific program requirements and emphasis of each particular area of the country or individual unit of the national park system.

The director of the National Park Service plans, directs, and controls all Service activities within prescribed congressional and departmental policies, regulations, and procedures. The director and Washington Office staff are responsible for the development of NPS policies, programs, regulations, and procedures.

Ten regional offices provide management oversight and operational support to 337 units of the system consistent with policy and direction from Washington. The superintendents report to the regional directors, who in turn report to the director. This is the basic management structure of the agency. With one major and several minor exceptions, the regional boundaries are drawn along state lines. This generally satisfies sociopolitical considerations and somewhat consolidates resource themes.

Over the years, as the Service has continuously expanded and increased in complexity, the individual parks have had to become responsible for more and more technical and specialized programs. Smaller parks that have been unable to sustain or justify specialized support staffs have had
to rely heavily on centralized support organizations in the regional offices and technical service centers. The large majority (86 percent) of the parks responded to the questionnaire that they were basically satisfied with the principal services and assistance received from the regional offices. The most dissatisfaction was found in the large parks (with GS-14 and -15 superintendents): Out of 42 responses from this size park, 12 (29 percent) responded negatively. Parks with GS-11 and -13 superintendents reported the greatest satisfaction (91 percent) with their regions' services, while 80 percent of the parks with GS-12 superintendents were satisfied.

Two major service centers at Denver and Harpers Ferry report to the Washington Office and have different servicewide technical support responsibilities. These offices are well coordinated with the management process of the Service. Their managers participate with and are responsible to top management through involvement with the director and regional directors at their meetings. However, there are several lesser offices carrying out direct operational activities in the field that report to division chiefs in the Washington Office and seem to be outside the basic management structure regarding decision-making relative to funding and priority of work activity. These include Air Quality, Geographic Information Systems, Operations Engineering, Mining and Minerals, Fire Management, and Water Resources. Several cultural resource offices and external assistance programs commonly cross regional lines in their work.
As the park system has expanded and the ten regional offices have evolved, a great disparity has developed in the workload of the different regions. Table 1 and the accompanying charts compare the various workload factors by region. The greatest workload imbalance exists between the Western Region and the Pacific Northwest Region, even though their top management structures are similar. There are 2,277 FTEs assigned to Western Region field areas and only 605 FTEs in the Pacific Northwest Region. A similar imbalance is seen in appropriations: $69.5 million compared to $19.0 million. For every dollar spent to support the Western Regional Office, $10.24 is spent in the parks. In the Pacific Northwest Region for every dollar spent in the regional office only $4.94 is spent in the parks. The ratio of regional office employees to field employees is 1:13 in the Western Region and 1:6 in the Pacific Northwest Region. Additional comparisons can be made for the other regions. However, the Alaska Regional Office should not be directly compared with the other nine regions. The recent expansion of the national park system in Alaska requires a heavy emphasis on that regional office relative to planning and public relations. Also, much operational support for remote Alaskan parks is provided from the regional office.

Alternatives

Consideration was given to a number of suggestions for realignment of the field organization of the National Park Service, ranging from a theme approach to an alignment according to ecosystem commonality. While all
Table 1: Existing and Proposed Workload Factors, by Region

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<td>12.42 18.58 17.77 20.03 17.59 11.16 16.84 25.04 14.05 31.11</td>
</tr>
</tbody>
</table>

### 6A. Other Appropriations

**Nat'l Rec & Pres**

<table>
<thead>
<tr>
<th></th>
<th>195.0</th>
<th>1,547.0</th>
<th>135.0</th>
<th>99.2</th>
<th>127.0</th>
<th>845.0</th>
<th>961.0</th>
<th>55.0</th>
<th>691.0</th>
</tr>
</thead>
</table>

**Land Resources**

|                | 272.4 | 753.4 | 1,272.2 | 268.7 | 0.0 | 359.8 | 529.7 | 1,164.8 | 632.6 | 692.9 |

### Information Sources and Special Notes:

1. States - NPS "Index", 1985 Edition
2. Congressional Delegation - Senators & Representatives with areas in their districts
   NPS Directory, List of Parks showing Congressional Districts and Congressional representation.
6A. Other Appropriations - WASO Budget Office

Alaska - 34 FTE and $1,269,000 moved from Park Support/Professional Services to General Administration to reflect all administrative personnel in General Administration.

National Capital - Park Police, Facility Management and Special Events included in Field Area, not Regional Office, totals.
### 1987 Budget Ceilings
National Park Service

- **Midwest**: 7.1% (30,599,400)
- **Pacific Northwest**: 5.3% (22,875,300)
- **Alaska**: 4.7% (20,250,000)
- **Southeast**: 14.2% (61,659,200)
- **National Capital**: 11.5% (49,953,100)
- **Rocky Mountain**: 13.6% (58,898,300)
- **Western**: 17.6% (76,258,600)
- **Southwest**: 6.9% (29,864,400)
- **Mid Atlantic**: 9.2% (39,743,200)
- **North Atlantic**: 10% (43,134,700)

### 1987 FTE Ceilings
National Park Service

- **Midwest**: 6.7% (946)
- **Pacific Northwest**: 5% (703)
- **Alaska**: 2.1% (294)
- **Southeast**: 15% (2116)
- **National Capital**: 14.4% (2031)
- **Rocky Mountain**: 13.8% (1945)
- **Western**: 17.4% (2455)
- **Southwest**: 7.1% (1009)
- **Mid Atlantic**: 8.7% (1234)
- **North Atlantic**: 10% (1412)
the suggestions have some merit, the basic directive to the task force to retain offices in all ten current regional locations effectively precluded many of the approaches that would result in significant savings in budget and FTEs. The alternatives considered below were reviewed with the principal criteria being workload balance.

1. Retain the existing field organization.

This alternative is based on the premise that the Service is functioning well as is. Regional and park staffs indicated on the questionnaire that they are relatively comfortable with the current regional alignment. This alternative would avoid complicating the process of change in administrative management with changes in regional field areas.

2. Create four major full-service regional offices distributed geographically about the country with relatively well distributed workloads.

The "super regions" would perhaps be at San Francisco, Denver, Atlanta, and Philadelphia. Seattle, Santa Fe, Omaha, Boston, and Anchorage would become group offices for management oversight and coordination of park support. The National Capital Region would become National Capital Park reporting to the Washington Office. This would result in the movement of approximately 274 employees, with relocation costs
of $4,110,000. A second-class management office would be created in each group office or smaller region.

The smaller regions would still require basic staffing of 60 employees. An example of a basic staffing pattern was developed using the Pacific Northwest Region study of January 1986. That study was based on a core staff of 30; however, the staff should be at least 60 to adequately deliver the most basic services as well as management oversight. The suggested staffing would be as follows:

<table>
<thead>
<tr>
<th>Position</th>
<th>FTEs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regional director</td>
<td>2</td>
</tr>
<tr>
<td>Associate regional director for resource management and visitor services:</td>
<td>2</td>
</tr>
<tr>
<td>Resource management and research (curatorial services, archeology, cultural and natural resources, external programs, research and compliance)</td>
<td>12</td>
</tr>
<tr>
<td>Interpretation and visitor services (VIPs, search and rescue, fire management, law enforcement, ranger activities, operations evaluation)</td>
<td>10</td>
</tr>
<tr>
<td>Associate regional director for park support:</td>
<td>2</td>
</tr>
<tr>
<td>Maintenance and engineering, quarters, energy, YCC, project support, environmental sanitation, maintenance management</td>
<td>11</td>
</tr>
<tr>
<td>Associate regional director for administration:</td>
<td>2</td>
</tr>
<tr>
<td>Budget, administrative services to regional staff, contracting and property management, internal control, ADP, staffing, classification, employee relations, mail and files</td>
<td>18</td>
</tr>
<tr>
<td>Public Affairs</td>
<td>1</td>
</tr>
<tr>
<td><strong>Total FTEs</strong></td>
<td><strong>60</strong></td>
</tr>
</tbody>
</table>
There would always be the possibility that those areas directly supervised by the super regions would be given more attention. This would be an awkward management approach that would require workload balancing.

3. Establish eastern and western administrative service centers.

The centers would support regional office and field needs for personnel, accounting, fiscal management, contracting, and property management. The ten regional offices would be staffed for basic management oversight, priority setting, and coordination of field area technical support requirements. This would do little to balance management workloads among the regions without regional realignment.

4. Redistribute regional staffs from office to office.

Staff redistributions would have limited workload-balancing possibilities because each regional office requires a basic staffing capability regardless of the total workload. This action would be very disruptive to employees and their morale. Each region seems to be meeting field expectations now according to the survey, and little would be gained from the mass disruption this would cause. Costs would be very high. Should this option be given serious consideration by others, it would require careful analysis.
5. Readjust regional boundaries.

This option could be utilized to provide a better balance of workload without major relocation of employees and the associated costs and morale impacts. In addition to workload balance, other factors considered in identifying possible boundary adjustments included resources or themes, sociopolitical conditions, and geographic proximity.

It was not considered feasible to realign the parks totally based on themes (Civil War, European Expansion, etc.) without radical changes in the numbers and locations of regional offices. This concept would also be sure to split states in some cases. However, themes were considered as one of the variables in recommending which states to realign. The same reasoning applied to the concept of realigning the parks according to physiographic conditions. The concept is an attractive one, in that it would place entire wildlife habitats, watersheds, etc., under the direction of one decision maker. But such groupings would totally violate the proximity principle and the sociopolitical scheme. Realignment along natural lines would also affect the alignment of cultural areas. Like themes, common ecosystems were considered relevant but not controlling factors for realignment.
Consideration was also given to aligning the states according to socioeconomic conditions and the attendant political climate. Examples would include timber industry in the Northwest, economy of the Ohio Valley, and perhaps tourism in the South. The advantages would be a cohesive constituency and development of certain specializations to support park superintendents. While this factor was an unrealistic basis for realignment, given the decision to retain the current regional offices, it was used as a decision-making variable.

6. The following additional realignment options were considered but are not recommended for the reasons stated:

Arkansas to Southeast. Although Arkansas was historically in the Southeast Region, the types of areas involved could just as easily remain in the Southwest Region. There was no overriding reason to further reduce the workload in Santa Fe or add to the already large workload in Southeast. Five parks, $3.5 million, and 122 FTEs are in Arkansas.

Pacific areas (Hawaii and the Trust Territories) to Pacific Northwest Region. Moving these areas to the Pacific Northwest would provide a better workload balance; however, the recommendation for Montana also would help achieve that.
Pacific areas to Alaska Region. Geographically and culturally the Pacific areas belong in the Alaska Region; however, Alaska is still very low on field FTEs, which imposes an already heavy burden on that regional office to support field operations. At present, the Alaska parks are a paramount priority and should remain the total focus of the region's workload. As a long-range recommendation, the task force proposes that the Pacific areas be reevaluated for transfer to the Alaska Region once the Alaska parks are fully operational. Workload represented is $5.6 million, nine units, and 188 FTEs.

Mesa Verde to Southwest. Mesa Verde (including Hovenweep and Yucca House) is culturally similar to areas concentrated in the Southwest. Adding $2.4 million and 70 FTEs would add too much workload to the Southwest Region, and interjecting the Southwest Region into the political arenas of Colorado and Utah would not be constructive.

Edison and Morristown to Mid-Atlantic. Edison and Morristown, located in New Jersey, have a New York City orientation. Adding $1.8 million and 64 FTEs to the Mid-Atlantic workload would not merit further realignment.

North and South Dakota to Midwest. Because of the region's Great Lakes/Great Plains character, it made more sense to add Kentucky to the Midwest than North and South Dakota. The
seven units are in the western parts of these states and have characteristics compatible with other parks in the Rocky Mountain Region. Also, the option would do little to reduce the distance from the regional office.
GENERAL

Background

When the National Park Service was created in 1916, the Department of the Interior provided most of the administrative support. The only administrative positions initially included in the Office of the Director were a chief clerk and later an accountant.

As the Service evolved, administrative positions were established in all areas with more than a token workforce. The growth of government in general during the first Roosevelt administration exacerbated the need for improved accountability and reporting. The concept of decentralizing some of the administrative workload from the Washington Office to the field was discussed with the Department in 1936. In August 1937 four regional offices were established, and for the first time the administrative system of the National Park Service provided for the development of data at the park level, the processing of the data within the regional offices, and the reporting of the data to the Washington Office.

Many laws have affected the administrative operations of the National Park Service, but none as much as the Budget and Accounting Procedures Act of 1950. The standardized governmentwide accounting and reporting
procedures required by that act resulted in the establishment of field finance offices in many of the parks. However, by 1966 all of these offices (and most of the personnel authorities associated with them) had been consolidated into the regional offices.

Demands for improved information coupled with an ever-increasing workload dictated certain modifications to the administrative system. Automatic data processing was not generally available to parks or regional offices until around 1980. Although the need was there, efforts to develop computer capabilities at an earlier date were continually frustrated. The National Park Service was never able to support or justify a mainframe, but it was able to automate many of its administrative programs through the acquisition of micro- and minicomputers and contractual agreements with other government agencies and private firms. Unfortunately, each region went its own way in the development of computer capability and competence. Regions developed ADP systems that were not compatible with other regions' systems or, in some instances, with their own parks' systems. As a result of the increase in use, need, and exposure, ADP support staffs of varying sizes began to appear in regional and park organizations after 1981.

At the same time, the National Park Service implemented departmental instructions to issue contracting warrants only to trained personnel. This procedural, and in many instances structural, change had a significant impact on administrative program budgets.
Another change came when several of the larger parks requested the return of certain personnel authorities that had earlier been centralized in the regional offices. These requests were approved in the interests of greater efficiency and effectiveness, and the field personnel staffs increased substantially.

Other circumstances affecting regional administrative staffing patterns have been the use of funding from the other sources to maintain the same level of service for their "common program" activities, which has resulted in the parks' assuming a more active role in financial functions, and the implementation of enhanced control and management measures, which require the preparation and submittal of various reports and other documented surveillance procedures.

Current Status, Resources, and Organizational Requirements

NPS administrative functions are conducted in a semidecentralized manner. Elements of administrative support can be found in nearly all organizational units to one degree or another. This report looks at administrative responsibilities in three categories:

Washington Office administrative responsibilities
regional office administrative responsibilities
park and field office administrative responsibilities
**Washington Office Administrative Responsibilities.** The National Park Service operates an administrative management program in the Office of the Director under an associate director for policy, budget, and administration. The associate director provides servicewide policy guidance and program direction over all administrative management and technical support functions. (Equal employment opportunity, which is discussed elsewhere, reports to the director.) At the Washington level $14.7 million and 227.2 FTEs were allocated to this responsibility.

In addition to direct program costs associated with management of the administrative program, additional costs are absorbed at the Washington level. Examples include unemployment compensation, FTS telephone service, GSA space rentals, postage, and the like. These expenses totaled $36.4 million in FY 1987.

**Regional Office Administrative Responsibilities.** Ten regional offices provide administrative support to the parks. The level of this support depends on the size and capability of each individual park office. Many larger parks have extensive administrative staffs and receive only administrative oversight from the regional offices.

The regional offices also provide administrative support and guidance in varying degrees to field offices other than parks. The Rocky Mountain Regional Office, for example, provides full administrative support to the Denver Service Center and partial administrative support to certain WASO divisions that are duty stationed in the vicinity. Administrative expenses
for all regional offices in FY 1987 totaled $22.3 million and covered 721.2 FTEs.

Park and Field Office Administrative Responsibilities. Whatever the size of a park or field office, a real need exists for some level of on-site administrative support. Very small areas may employ a single administrative clerk, while larger field areas have an administrative officer or technician and possibly additional administrative specialists. Some very large parks are staffed to handle most routine administrative processes. For large park administrative offices, the principal role of the regional office is to monitor programs, coordinate output products, ensure compliance with priorities, and establish administrative policy.

The workload of a regional administrative office depends in part on the volume of administrative work accomplished by the field areas in the region. A region with many small areas with limited delegated administrative authority must accomplish much of the administrative work within the regional office. Large parks process most of their own work. Because of the increased demands for highly specialized information regarding park programs, increased visitor use, and similar factors, a certain level of administrative activity needs to be conducted at the field level irrespective of the availability of regional administrative support services or other centralized administrative functions. Servicewide, a total of 1,005 FTEs and $28.9 million were allocated to parks and field offices in FY 1987.
Administration as Part of the Total ONPS Program. The general administration program theoretically funds common administrative costs and the costs associated with Washington and regional office administrative support and service. However, general administration is also subsidized with park management funds. Therefore, administrative support and service in the National Park Service is reported under (1) general administration, which provides for most—but not all—of the Washington and regional office administrative support services, and (2) management of park areas, which provides for administrative support operations in the field and that portion of the operations in the Washington and regional offices not provided for by number (1) above.

PROGRAMMING AND BUDGET

The programming and budget process is a reflection of management intent and goal accomplishment. It is extremely important that the mechanics of budgeting not overshadow the true importance of the budgeting process.

Background

The programming and budgetary functions are now managed as a single operational entity in the Washington and regional offices. Historically, they were separated: Budgeting was closely linked to finance and financial management (primarily because of the budget execution process),
while programming was considered an operational process with closer ties to management. The two functions have always been closely interrelated, however, requiring frequent and direct contact between those responsible for programming and those responsible for budgeting.

The Budget Division in the Washington Office is currently four layers removed from the director, the most distant it has ever been. Since this is a brand new organizational arrangement and its effectiveness is yet to be determined, it will not be addressed in this report.

Current Status, Resources, and Organizational Requirements

The Service is a decentralized organization in the truest sense. It is believed that no other bureaucratic organization offers an equal opportunity to its managers to express operational needs for resources to the degree that is possible in the National Park Service. Delegations of authority from the director, through the regional directors, to the park superintendents place responsibility and accountability at the lowest possible management level, which makes it obligatory that these managers have competent advisory staffs.

Based upon the difficulty this task force encountered in assembling data to depict program costs and authorizations, it is questioned whether management is receiving all the information it needs to make important decisions regarding resource requests and fund allocations.
Park superintendents are responsible for initiating the planning and programming processes for their areas. Program authorizations are fund allocations from the regional directors to the superintendents. These must be accounted for by the superintendents, who are also responsible for any reprogramming of these funds to meet changing needs or emergencies. Field managers handle most of the actual programming and budgetary responsibilities at the park level, and apparently they consider these inseparable from management. To most effectively determine park priorities and ensure the best use of available resources, it is sometimes necessary to establish subsidiary staff positions in park offices to support this process. (There are also a number of budget and fiscal assistants and similar positions, but they deal mainly with work assignments considered to be part of the finance function.)

Park managers' responses to the questionnaire indicated general satisfaction with the organization and performance of the programming and budget function. One concern is the procedure used to request services from the various technical service centers. Of those responding, 40 percent said their regions did not routinely request their priorities for service center work, and 55 percent were not satisfied with the priority-setting process for these programs.

Programming and budgeting at the regional level involve additional prioritizing and packaging of project requests initiated in the parks. In this period of fiscal constraint, limited input is sought from the field areas to support budgetary increases. Regional directors have become
increasingly engaged in the total programming and budget process and
more often than not deal directly with key budgetary staff when
significant funding issues are concerned. A comparison with 1975 data
indicates that programming and budget, like many administrative
activities, has lost ground in regional offices over the past 12 years.
Permanent positions have declined from 44 to 42 in spite of greater
demands for information, increased programs, and additional parks and
regions. The activity is fragmented, and programming and budget
specialists appear in many organizations outside administration.

In the Office of the Director, programming and budgeting decisions are
frequently made at the staff level. Budget and program formulation is
normally an extension of the director's priority-setting process, but
because of the volume of information assembled in support of budget
submissions, certain judgmental calls are made by the staff to expedite
the process. The same situation is true for funding allocations. Whereas
the regional directors normally control the allocation of funds in the
regions, many of the fund movements and supplementary allocations in the
Washington Office are actually controlled at the staff level.

As was the case in 1975, the Washington Office has the largest number of
permanent programming and budget positions in the Service. The WASO
staff are specialists who deal mainly with the Department and the Office
of Management and Budget in preparing budget requests for submittals.
In the Washington Office the programming and budget role is one
primarily of reporting, whereas in the parks and regions the programming
and budget role is advisory to management.
AUTOMATIC DATA PROCESSING

Automatic data processing (information systems management) is critical to organizational effectiveness. The Service's relatively undeveloped ADP capability was found to be a significant concern by the three subcommittees studying administrative programs, operational programs, and technical service centers. The Service must develop effective and efficient ADP and electronic communications systems in conjunction with any recommended organizational alignments.

Current Status, Resources, and Organizational Requirements

During the past five years, the level of computer literacy among employees has increased dramatically. Responses to the questionnaire indicated that 132 parks have ADP management plans. This figure, although lower than desired, shows that park managers are using computers to identify and resolve problems.

The availability of hardware has driven ADP efforts to date. Very seldom have data-processing requirements been determined first, followed by determinations of appropriate software, hardware, and staff. The Washington Office has contributed to this backward approach by providing little in the way of system design assistance and by funding various special programs for hardware procurement. There is little evidence that the requirements of the various programs were considered together and
the hardware procured accordingly. Activities that have received computers through special programs are

- maintenance management
- automated procurement documentation
- AFFIRMS (fire management)
- national cataloging
- law enforcement
- public health
- air quality
- water quality
- resource management training

A look at the hardware currently in use emphasizes the importance of standardization in servicewide computer procurement. In most cases there is little compatibility between individually procured elements. All too often the total costs of individual mini- and microcomputers are not considered prior to procurement. As a result, full utilization is not attained because operating programs cannot afford the necessary training, software, and maintenance. The local information management service may not be sufficiently staffed or trained to provide full support. In addition, many systems that were installed in the early 1980s are no longer cost-effective to maintain. This will become a critical cost factor for the Rocky Mountain, Midwest, Pacific Northwest, and to a lesser extent, Western and Alaska regions over the next five years. All of these regions have begun the transition to MS-DOS technology that is fast becoming a standard in the Service, but the replacement of equipment in these regions will require creative funding.
A servicewide task force appointed in 1985 developed a set of specifications that addressed ADP needs. This project should be reinstated or brought back into focus. (Along these lines, the NPS should reinforce the importance of supporting the GSA administrator's program, "Go for 12," attempting to reduce procurement actions from their current three-year cycle to 12 months or less.) The Service must be able to acquire new and replacement computer configurations. It is unacceptable that the largest bureau in the Department of the Interior lacks the computer capability of one of the smallest bureaus (Minerals Management). The parks have indicated their willingness to acquire ADP equipment and to utilize it to improve the management of information throughout the Service.

Restrictions on equipment purchases have had an adverse effect on the development of technical competence. The small staff allocated to support the ADP function reflects the lack of progress in this field. Overall, six-tenths of one percent of the total FTEs are allocated to support the ADP function. More than a third of these positions are in Washington. Many of the field positions have been reallocated by parks with reductions in other programs.

Superintendents should not have to reduce other essential services to gain efficiencies available through automated systems. The majority of the productive ADP development projects completed during the past four years have been accomplished in the field. This productivity could be enhanced by a redistribution of FTEs.
In addition, the parks should have some latitude to modify or enhance existing systems and to develop new systems to meet their specific requirements. There is concern that certain ADP systems identified for servicewide application, although they may meet the needs of WASO programs, do not assist the parks in accomplishing work. Many do not conform to standards for development, software, training, or implementation. Local users/ managers seldom have an opportunity to control or validate the costs of programs and systems they are required to use. The Service lacks a method of reporting costs associated with ADP activities at the field level. This appears to be a defect in the current financial management process that needs to be corrected if we are to obtain accurate ADP cost figures.

There is also concern on the part of many field managers that control and oversight functions in WASO drive the system. Although oversight, review, and reporting are necessary, the extent to which they are practiced is not consistent with the goals and objectives of the President's Council on Management Improvement, which is seeking deregulation, simplification, and mission delegation.
MANAGEMENT ANALYSIS AND CONSULTING

Background

The management analysis or management consulting function was established as a divisional entity 25 years ago in the Washington Office. Originally the Branch of Organization and Management was responsible for conducting management appraisals, operational improvement reviews, procedural analyses, and organizational structure studies. It was also responsible for directives, reports, and records management. The Branch of Statistics Analysis was responsible for developing a servicewide statistical data program for use in park operations, planning, and development. A divisional management analysis function was created shortly thereafter in the National Capital Region, but no other regional office assigned personnel to specific management analysis tasks. Prior to 1982, a few personnel in regional offices had been assigned the title of management analyst and functioned as operations evaluators and special assistants, but these were generally misnomers and titles of convenience. In the past four years, however, regional office management analysis units have emerged as a result of various initiatives and administrative requirements.
Current Status, Resources, and Organizational Requirements

Today the WASO management analysis function is assigned to the Administrative Services Division. The division, which is subdivided into two branches (Analysis and Special Projects, and Directives and General Services), is responsible for analytical staff support for organizational reviews and has line responsibility for internal control and audit coordination, space management, and paperwork management. The Analysis Branch is the primary unit responsible for analysis reporting, while the Directives Branch operates the more traditional paperwork management functions. The division is also responsible for overview and evaluation of the effectiveness of field operations involving its activities.

Most of the regional management analysis units were established with the advent of the OMB A-76 program. A-76 typified the multiple-discipline and integrative nature of management analysis. It focused on park maintenance activities but had programmatic effects on other park operations, such as resource management, interpretation, and safety. The process required diverse analytical skills to conduct financial comparisons, determine budgetary impacts, evaluate personnel and organization roles, and develop contractual specifications. Most successful A-76 programs also relied heavily on the application of ADP technology. Program analysis and development were paramount because of the unavailability of guidelines and applicable models.
With the decrease in emphasis on A-76, the management analysis units are focusing on new regional management needs and priorities. Included in their assignments are new initiatives, special emphasis programs, and activities warranting special attention by regional management (especially those activities of a multiple-function nature not cleanly fitting into an existing operating division). Examples are internal control, the productivity improvement program, cooperative grants and interagency agreements, housing programs, policy and procedure reviews, telecommunications, common administrative service units, and a myriad of coordination duties.

All regional offices that do not have management analysis units find other methods of getting the work done through delegations to various divisions or in some instances through outside reviews. Existing regional management analysis units are each structured differently, reflecting the regional management style, local requirements, and mix of duties. Flexibility of structure, rather than standardization, appears to be the key to each unit's effectiveness.

The management analysis function needs to be organizationally placed where it can retain neutrality and where it can gain access to, establish communication with, and secure cooperation from all regional organizations. The simplest way to achieve these objectives is to place the management analysis function directly under the regional director or deputy regional director. However, this may weaken the span of control. Because management analysis is a function and not an operational
Responsibility, it can also be placed under the associate regional director for administration if the four above conditions can be met.

Staffing in regional management analysis units is fairly standard (two to five FTEs). The size of the region and number of parks does not significantly affect the program workload except for some aspects of operations evaluations. Regional management analysts agree that an optimal mix of staff consists of three types of personnel: a program analyst with a working knowledge of park programs and operations (recruited from inside the Service), a management analyst with a professional knowledge of management analysis theory, techniques, and applications (recruited from outside the Service), and a paraprofessional support staff member who can complete structured analysis procedures.

**CONTRACTING AND PURCHASING**

**Current Status, Resources, and Organizational Requirements**

The procurement function is largely decentralized to the regions, parks, and field offices and is performed at approximately 113 locations. The Washington Office (specifically, the Contract Policy Branch of the Administrative Services Division) is responsible for the development of contracting policy and procedures, and retains review/approval authority for certain categories of contracts in keeping with departmental and federal acquisition regulations. Other contracting authority is delegated to the regional offices and field areas within approved warrant limitations.
The current Department of the Interior contracting officers warrant system, implemented in 1984, ensures minimum standards of training and experience for contracting officers who are authorized to sign government contracts and to obligate the government. The warrant levels are as follows:

**Level I**—open market purchase orders under $10,000 and delivery orders up to the maximum order limitations under mandatory Federal Supply Schedule contracts (May be issued to employees in any occupational series.)

**Level II**—same as level I, between $10,000 and $25,000 (May be issued only to GS-1105 and GS-1102 occupational series.)

**Level III**—contract actions up to $200,000 (May be issued only to employees in the GS-1102 occupational series.)

**Level IV**—unlimited authority (May be issued to employees in the GS-1102 occupational series.)

The issuance of warrants is controlled by the Washington Office through an appointment system that includes a review of nominee qualifications and a determination that the workload statistics justify a warrant on-site. Only the minimum number of employees required to carry out procurement activities at a single location are considered for warrants. Of the 309
warrants issued at the present time, 242 are at level I or II. There are 67 level III or IV warrants, but a larger number of employees are actually performing contracting and procurement services, because the larger regional offices and the Denver Service Center have contract specialists who do not have warrants.

Warrant figures can be compared to workload data to measure the average number of procurement actions per warrant officer by region. Table 2 displays the numbers and dollar amounts of contract actions and small purchases accomplished in FY 1986. (Contract actions generally include awards, modifications, and delivery orders. These figures do not include actions under $10,000, the servicewide volume of which is negligible. Purchase orders only include small purchases under $10,000.) Table 3 shows the average number of contract actions and purchases per warrant; however, it does not factor in the number of contract specialists who do not have warrants, which accounts for some of the disparity among the various offices. Another variable hidden in the statistics is the fact that many warrant officers do not work full time in procurement, which reduces the average production per warrant.

In 1985 the President's Council on Management Improvement, Common Administrative Services Team, reviewed the procurement function and established standards for the number of actions to be processed per employee per year. Although the standards have not been mandated for implementation, the Department of the Interior has informally adopted them in conducting its productivity measurements. The standards
Table 2: Contract Actions and Purchase Orders, by Region, FY 1986

<table>
<thead>
<tr>
<th>Region</th>
<th>Contract Actions</th>
<th>Amount ($ thousands)</th>
<th>Purchase Orders</th>
<th>Amount ($ thousands)</th>
</tr>
</thead>
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<td>$ 2,937</td>
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<td>65</td>
<td>2,322</td>
<td>2,409</td>
<td></td>
</tr>
<tr>
<td>Harpers Ferry Center</td>
<td>441</td>
<td>2,565</td>
<td>2,610</td>
<td>1,013</td>
</tr>
<tr>
<td>Denver Service Center</td>
<td>376</td>
<td>64,697</td>
<td>136</td>
<td>1,594</td>
</tr>
<tr>
<td>Washington Office</td>
<td>310</td>
<td>11,611</td>
<td>345</td>
<td>109</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>2,693</strong></td>
<td><strong>$132,300</strong></td>
<td><strong>87,370</strong></td>
<td><strong>$31,258</strong></td>
</tr>
</tbody>
</table>

Table 3: Average Number of Contract Actions and Purchase Numbers per Warrant, by Region, FY 1986

<table>
<thead>
<tr>
<th>Region</th>
<th>Contracts (level III &amp; IV warrants)</th>
<th>Purchase Orders (level I &amp; II warrants)</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Atlantic</td>
<td>20</td>
<td>208</td>
</tr>
<tr>
<td>Mid-Atlantic</td>
<td>32</td>
<td>798</td>
</tr>
<tr>
<td>National Capital</td>
<td>128</td>
<td>939</td>
</tr>
<tr>
<td>Southeast</td>
<td>14</td>
<td>144</td>
</tr>
<tr>
<td>Southwest</td>
<td>19</td>
<td>263</td>
</tr>
<tr>
<td>Midwest</td>
<td>38</td>
<td>287</td>
</tr>
<tr>
<td>Rocky Mountain</td>
<td>27</td>
<td>350</td>
</tr>
<tr>
<td>Western</td>
<td>20</td>
<td>381</td>
</tr>
<tr>
<td>Pacific Northwest</td>
<td>22</td>
<td>288</td>
</tr>
<tr>
<td>Alaska</td>
<td>22</td>
<td>301</td>
</tr>
<tr>
<td>Harpers Ferry Center</td>
<td>220</td>
<td>2,610</td>
</tr>
<tr>
<td>Denver Service Center</td>
<td>125</td>
<td>86</td>
</tr>
<tr>
<td>Washington Office</td>
<td>155</td>
<td></td>
</tr>
</tbody>
</table>
recommend that a journeyman contract specialist accomplish 28 contract 
actions per year, and that a journeyman purchasing agent or other 
authorized employee accomplish 1,400 purchase orders per year in a field 
office or 1,000 per year in a headquarters office. (This latter figure was 
based on small purchases of $10,000 or less.) Table 4 compares current 
staffing levels with the expected staffing levels if these standards were 
imposed throughout the National Park Service.

Table 4: Expected Staffing Levels Based on Procurement 
Productivity Standards, by Region

<table>
<thead>
<tr>
<th>Region</th>
<th>Level III &amp; IV Staffing</th>
<th>Level I &amp; II Staffing</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Current FTEs</td>
<td>Expected FTEs</td>
</tr>
<tr>
<td>North Atlantic</td>
<td>4</td>
<td>2.8</td>
</tr>
<tr>
<td>Mid-Atlantic</td>
<td>3</td>
<td>3.5</td>
</tr>
<tr>
<td>National Capital</td>
<td>2</td>
<td>9.1</td>
</tr>
<tr>
<td>Southeast</td>
<td>12</td>
<td>5.8</td>
</tr>
<tr>
<td>Southwest</td>
<td>7</td>
<td>4.8</td>
</tr>
<tr>
<td>Midwest</td>
<td>6</td>
<td>8.1</td>
</tr>
<tr>
<td>Rocky Mountain</td>
<td>11</td>
<td>10.7</td>
</tr>
<tr>
<td>Western</td>
<td>9</td>
<td>6.4</td>
</tr>
<tr>
<td>Pacific Northwest</td>
<td>3</td>
<td>2.4</td>
</tr>
<tr>
<td>Alaska</td>
<td>3</td>
<td>2.3</td>
</tr>
<tr>
<td>Harpers Ferry Center</td>
<td>2</td>
<td>15.8</td>
</tr>
<tr>
<td>Denver Service Center</td>
<td>3</td>
<td>13.4</td>
</tr>
<tr>
<td>Washington Office</td>
<td>2</td>
<td>11.0</td>
</tr>
</tbody>
</table>

These figures are, of course, rough indicators based on broad workload 
statistics. They represent only regional averages and do not allow 
examination of workload/manpower distribution among individual parks. 
However, they do indicate that imbalances exist among regions and that 
there are, in some cases, wide disparities between current resources and 
those the Department would consider justifiable.
Some of the disparity regarding the small purchase figures is due to the proliferation of level I and II warrants at remote field sites. The 1400:1 standard is basically inapplicable in such a setting where timeliness of processing makes centralization of the function impracticable. Both the 1400:1 and the 1000:1 standards are based on positions that perform purchasing duties only. NPS procurement employees routinely perform many functions not related to purchasing. The standards cannot, therefore, be applied across the board without further analysis.

It is generally recognized that any of the various organizational placements of the procurement function (i.e., centralized or decentralized) are feasible, as long as the expertise and authority are available. In the National Park Service, major construction contracting and architect and engineering contracting are centralized in the Denver Service Center. Other contracting and all purchasing are largely decentralized to the regional offices and parks. Of the 67 level III and IV warrant officers throughout the service, 28 (or 42 percent) are located in field areas.

The majority of the parks responding to the questionnaire indicated that the current structural arrangement is largely satisfactory. There was very limited support expressed for centralization of contracting at the regional office level, except among small parks without their own contracting staffs. Virtually no support was expressed for centralization of purchasing in the regional offices. The reasons cited included the need for personal contact, familiarity with park problems, and timeliness tied to geography.
Certain specialized areas (ADP hardware and software, telecommunications systems, motor vehicles, and heavy equipment) lend themselves to servicewide consolidation. Procurement of ADP hardware and software is currently decentralized, and some hardware is being procured at the regional office level. Washington Office approval is needed prior to noncompetitive procurements over $10,000, competitive procurements over $50,000, noncompetitive procurements of maintenance services over $50,000, and competitive procurements of maintenance services over $200,000. Clearance is required prior to procurements when the requirements meet or exceed the thresholds set by 306 DM 4.4 and FIRM R201-32. Expertise in procurement of ADP hardware and software is limited servicewide. Most contracting officers never encounter a major ADP procurement, and many struggle with the complex procedures of even minor procurements. This is a logical area for consolidated procurement to ensure compatibility of equipment and cost savings from volume buys. An inherent disadvantage is an extended lead time to provide for consolidated orders and to obtain required clearances at the higher dollar threshold.

Telecommunications contracting is a relatively new procurement experience caused by deregulation and divestiture of the telephone industry. Little technical or procurement expertise is available in the Service. System acquisition, lease, and lease-to-purchase options are available, and major system decisions must be made in the near future. This is a logical area to centralize both program and procurement functions to obtain expertise and effective system appreciations and life-cycle cost savings due to better specifications and volume procurements.
Motor vehicle and heavy equipment procurement is another area of specialized procurement which at present is decentralized. Familiarity with equipment needs and performance can be fostered through centralization and can result in better specifications and cost savings.

Further consolidation of procurement would not necessarily result in savings of FTEs. In fact, additional FTEs would probably be required. The majority of all park procurement personnel occupy positions that have additional functions, and procurement requires only two-fifths to four-fifths of their time. Transfer of a procurement function to a region or Washington office would necessitate additional staffing at that end to accomplish the increased workload, but it would not eliminate the need for the position in the park. Additionally, if ADP, telecommunications, and motorized equipment procurement were centralized, additional program specialists would be required for specifications preparation and contract administration.

Positive aspects of centralization include better program planning, procurement expertise beyond that currently available, reduced cost of maintaining contracting warrants, better specifications due to program familiarity, life-cycle costing applications, standardized equipment and systems, and lower costs due to volume procurement. Negative aspects include longer procurement lead times, lack of personal contact, less familiarity with park problems, and increased travel to administer contracts.
Alternatives

1. Retain the current extent of decentralization in both contracting and purchasing.

2. Centralize level IV warrants at the regional office level.

3. Centralize level III and IV warrants at the regional office level, with staffing based on the regionwide workload.

4. Centralize level III and IV warrants at a national center, with staffing based on the servicewide workload.

5. Centralize special procurements such as ADP, telecommunications, and motorized equipment at a national center, with staffing based on servicewide workloads.

6. Reduce procedures required for small ADP procurements and decentralize approval authority.
PROPERTY MANAGEMENT

Current Status, Resources, and Organizational Requirements

The National Park Service differs from many other federal agencies in the diversity of property managed. The Service manages and is accountable for approximately 150,000 line items of personal property valued at more than $150 million, approximately 74.8 million acres of land valued at $2.6 billion, and approximately 120,000 structures and facilities valued at $1.3 billion.

The Service currently operates a decentralized real property management system with records maintained in the regional offices and the parks. The regional office records are reconciled to the general ledger and are duplicated at the park level. Most records are manually prepared.

During the past several years, numerous deficiencies have been identified in the Service's program of property accountability, control, and management. These deficiencies have been cited repeatedly in audit reports from the General Accounting Office, the Office of the Inspector General, and the Office of Acquisition and Property Management. Further, the Service has found similar deficiencies through its own internal property management reviews. In response to these negative audit findings, in 1984 a study team of representatives from selected WASO program and administrative offices conducted an in-depth review and evaluation of the Service's property management program. The study
took nine months to complete and involved review of internal and audit reports, existing regulations and guidelines, delegations of authority, and organizational structure.

In its final report, the study team identified 23 problem areas relating to program support, organization, communications, training, accountability and control, automated systems, and reports. Accompanying these were recommendations for corrective action. These were subsequently incorporated into the management-by-objective process to provide a cohesive and orderly approach for implementing the recommendations contained in the report. This is an intensive three-year project that is still underway, although considerable progress has been made.

The WASO Branch of Property Management has reviewed a number of automated personal property systems which utilize bar-code technology. The most complete operational system reviewed to date is the Department of Agriculture system (PROP), which is an on-line system with capabilities that are usable by the National Park Service without significant modification. The Service has provided the Department of Agriculture with its specific requirements, and the Department is expected to report back with an estimate of start-up and processing costs for NPS conversion to the system.

The PROP system is considered superior to the present Department of the Interior personal property management systems; however, since the Service will not be fully integrated into a related financial management
system, it cannot utilize the PROP to the fullest. An integrated financial/property management system should eliminate duplication of input into two different systems. The benefits of an integrated financial/property management system should be a major consideration in future plans for a new finance system for the Service.

No servicewide real property system has been identified to date. Some of the regions are in the process of automating their real property systems on their own. A servicewide system should be a priority after completion of the personal property management system.

FINANCE

Current Status, Resources, and Organizational Requirements

The resources currently devoted to financial operations are shown in table 5.

The National Park Service has already begun some initial planning for a consolidated finance office through an internal implementation team. A proposed organization chart has been developed complete with functional statements of what must be performed in each branch. However, regardless of what method of operation is chosen for a consolidated finance office, certain finance-related functions must still be performed in the regions and parks. Residual regional functions will include policy coordination, liaison, and answering questions.
Table 5: Operating Costs for Finance, by Region, FY 1987

<table>
<thead>
<tr>
<th>Area</th>
<th>Positions</th>
<th>FTEs</th>
<th>Operating Costs</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Atlantic</td>
<td>10</td>
<td>9.4</td>
<td>$237,000</td>
</tr>
<tr>
<td>Mid-Atlantic</td>
<td>13</td>
<td>11.2</td>
<td>356,600</td>
</tr>
<tr>
<td>National Capital</td>
<td>20</td>
<td>18.8</td>
<td>525,845</td>
</tr>
<tr>
<td>Southeast</td>
<td>28</td>
<td>23.5</td>
<td>530,300</td>
</tr>
<tr>
<td>Midwest</td>
<td>12</td>
<td>11.2</td>
<td>261,283</td>
</tr>
<tr>
<td>Southwest</td>
<td>22</td>
<td>18.3</td>
<td>429,600</td>
</tr>
<tr>
<td>Rocky Mountain</td>
<td>45</td>
<td>36.0</td>
<td>774,400</td>
</tr>
<tr>
<td>Western</td>
<td>28</td>
<td>23.6</td>
<td>487,000</td>
</tr>
<tr>
<td>Pacific Northwest</td>
<td>18</td>
<td>17.2</td>
<td>352,130</td>
</tr>
<tr>
<td>Alaska</td>
<td>2</td>
<td>2.0</td>
<td>51,200</td>
</tr>
<tr>
<td>Subtotals</td>
<td>198</td>
<td>171.2</td>
<td>$4,005,358</td>
</tr>
<tr>
<td>Washington Office</td>
<td>32</td>
<td>27.0</td>
<td>1,436,600</td>
</tr>
<tr>
<td>Totals*</td>
<td>230</td>
<td>198.2</td>
<td>$5,441,958</td>
</tr>
</tbody>
</table>

*These figures do not include approximately eight positions which are performing preliminary finance-related functions at the Harpers Ferry Center.

Virtually every administrative function is a combination of repetitive mechanistic processes and unique services. The repetitive mechanistic processes are very conducive to consolidation, but the unique services (one-on-one contacts, advising and counseling, and location-specific functions) could be extremely inconvenient to field offices if they were administered at the national level. Most finance offices provide the field areas with a great deal of information and training related to travel and relocation issues. Finance offices also spend a considerable amount of time monitoring imprest fund expenses and providing guidance and instruction to park imprest cashiers. In addition, finance offices are frequently called upon to answer general government accounting
questions, such as how much money is in a certain account, whether prior-year money can be used for certain procurements, and what certain adjustment items on internal reports mean.

While regional budget personnel can handle some of these questions, travel issues, relocations, internal controls, subsidiary reconciliations, and issuing of bills of collection are beyond a budget office's normal area of expertise and cannot be realistically transferred to a budget office without permitting some retention of skilled finance personnel in those offices. In addition, some of the remote entry of obligation and payment data may need to be kept in some of the regional offices until a servicewide integrated ADP network is in place. For these reasons, it is assumed that an average residual staff of five FTEs per region would be required to accomplish the nonroutine, nonmechanistic financial functions at the regional level.

Alternatives

The task force analyzed four alternatives based on various finance office organizational structures found in the Department of the Interior. All four alternatives assume that all cash payments, payment certification, accounting, reporting, cash reconciliation, and other finance office functions will be performed from a consolidated finance office. Since the National Park Service does not currently operate under a consolidated finance office, much of the information used for this review was obtained
from other Department of the Interior bureaus. The primary differences among the alternatives are the extent of ADP enhancements and the degree to which finance office operations would be contracted out.

Detailed workload estimates were prepared for each alternative and are summarized below. The workload estimates and the analysis of the alternatives were based on the following assumptions: (1) that the finance office workload (transaction volume) of the National Park Service is similar to the workload of other Interior bureaus, (2) that each regional finance office is currently performing essentially similar functions, (3) that the departmental FIRM study will lead to a consolidated departmentwide accounting system in the near future and that whatever accounting systems are currently in use in the department thus have a limited life expectancy, (4) that no current regional office functions other than finance will change as a result of the consolidation, and (5) that all possible efficiencies (excluding ADP enhancements) that the finance office has the ability to control have already been implemented (these include statistical sampling of payments, use of magnetic tapes to issue checks, and having voucher examiners review the accounting codes on obligation documents, the edit listings, and the error corrections).

Some interesting conclusions can be drawn from the data compiled in this study. The first is that, as far as financial applications are concerned, ADP enhancements would not necessarily result in cost savings. The ADP enhancements considered in this study could eliminate approximately 13 positions from the Consolidated Finance Office. However, most of these
would be low-graded clerical jobs, so eliminating them would not save much. Furthermore, in place of these lower graded clerks, higher graded systems analysts and programmers would have to be hired to keep the ADP systems running smoothly. In addition, ADP operation and maintenance costs would increase by approximately $300,000 per year with any type of database automation. Thus, while an automated database might reduce errors, improve the flow and availability of information, increase employee satisfaction, and improve transaction processing time, it emphatically would not save costs, at least not in financial applications. However, the costs of ADP enhancements must be weighed against the benefits in terms of service to the parks. The National Park Service is unique among the Interior agencies in the complexity of its field operations. With law enforcement, utilities, sewer and water services, resource management, roads maintenance, etc., a typical national park has a definite need for detailed financial information that cannot be fully served without a sophisticated ADP network.

Another general conclusion is that consolidating finance offices by themselves would not produce significant cost savings. In FY 1987 the National Park Service programmed approximately $5,442,000 for finance office administration servicewide. Even the least expensive alternative for consolidating the finance offices would cost more.

**Alternative 1.** Decentralized preparation of paperwork, centralized data entry. Centralized payments, payment certification, accounting, and reporting. Periodic internal reports sent to field offices. Minimal ADP enhancements.
Estimated FTEs: 143 in central office, 5 in each region, 7 in headquarters policy office

Estimated operating costs: $3,968,000 in central office, $150,000 in each region, $363,000 in headquarters policy office

Estimated implementation costs: $844,000

Under this alternative, no office other than the Consolidated Finance Office would have any direct on-line access to financial information. All obligation, payment, accrual, collection, and other miscellaneous documents would be mailed to the central office by the field areas. The central office would enter transactions into the accounting system from the hard-copy documents. Once these transactions were entered in the system, a permanent record would be created from which internal and external reports would be issued. While their ADP systems differ widely in their sophistication and processing capabilities, essentially all Department of the Interior finance offices maintain a centralized control over data entry similar to that proposed in this alternative. Field offices in other Interior bureaus know nothing about the financial information in the system until monthly internal reports are issued to them.

This alternative has the following advantages:
It would be relatively easy and inexpensive to implement, since most of the finance functions performed in the regions would be moved to the Consolidated Finance Office without any major changes in the processing system.

It would not require a high level of in-house expertise in ADP systems design, telecommunications, or computer programming. It could be accomplished without major modifications to the existing ADP system.

No significant retraining would be needed, providing regional finance people were available to staff the Central Finance Office.

Of all the alternatives considered, this one is the only one that could be fully implemented by the October 1, 1988, deadline established by the Department.

However, from the National Park Service's perspective there are some important disadvantages to using this alternative:

The field offices' access to information would be reduced, and they would have more questions. To help remedy this, vendors would be required to send all invoices directly to the field offices, who could keep cuff accounts of their expenditures for reconciliation with the internal reports they would receive monthly. While this would increase the level of information available to the field offices, it
would also delay payments to vendors because of increased mail times. Late interest payments could be expected to rise significantly.

Year-end closing would be a nightmarish process. Cutoff dates would need to be established for sending information to the Central Finance Office. Field areas might not know that they had money to spend until after the cutoff dates had passed. Sending all documents through the mails would mean significant time delays between the authorization of a procurement in the field and the recording of an obligation in the accounting system.

The Consolidated Finance Office would be comprised of a greater proportion of clerical staff, which could mean high staff turnover.

There would be no potential for streamlining other administrative areas such as property management. Property acquisitions would have to be documented on two forms, the DI-102 for the property office and the receiving report for the finance office. If field areas had remote access, automation could perhaps be used to reduce the number of documents prepared at the field level.

There would be virtually no reduction in staffing from the current level with regional offices included. The National Park Service would be unable to reduce its finance office staffing level down to the 165-FTE goal established by the Department.
The National Park Service is unique among the Interior agencies in the complexity of operations that must take place at the field level. Along with that complexity are increased informational needs. Thus, while this approach might be fully acceptable and working well in several other Interior bureaus, it might not be workable in the National Park Service.

**Alternative 2.** Decentralized preparation of documents, decentralized data entry. Centralized review of documents prior to payment, centralized edits, centralized accounting adjustments prior to batch updating of accounting records. Periodic downloading and transmittal of internal reports to field offices on line. Capability for field offices to print reports through a slave printer.

Estimated FTEs: 137 in central office, 5 in each region, 7 in headquarters policy office

Estimated operating costs: $4,688,000 in central office, $150,000 in each region, $363,000 in headquarters policy office

Estimated implementation costs: $3,884,000

This alternative would take the obligation control function as it operates in the Rocky Mountain Region and expand it to the nine other regions. Accruals and fee collections could be entered into the system using the
same methodology. Conceivably, all internal management reports could be downloaded and transmitted directly to the field over the terminal as a print file. The field offices could print their own reports on location.

This alternative would require the development of an up-front system to receive information transmitted by the field offices, which the Consolidated Finance Office would review before batch updating its accounting records. The up-front system would guarantee that all accounting entries were legal and in the proper format before they were entered into the official accounting records. Thus, data entry could be delegated to the field offices without compromising the data entry control function in the central office.

The advantages to this alternative include the following:

The time lag between authorization of procurements in the field and recording of the obligations in the accounting records would be significantly reduced. (The Rocky Mountain Region boasts a one-day turnaround time.) As a result more current information would be available to the field offices. Mail time delays would be reduced considerably. If the up-front system was designed to have query capability, field offices should have access to any financial information they needed at any time.

Year-end closing should go much smoother than under alternative 1. Obligations could be submitted up until September 29. Field offices
should know on a much more current basis where they stand financially.

ADP enhancements would create the potential for streamlining other administrative functions, such as property management. With the right programming one entry at the field level could report an acquisition on the property records and an accrual on the finance records.

The number of accounting technicians needed for data entry would be reduced. There would also be less need for clerical staff to assist in report distribution.

The disadvantages of alternative 2 include the following:

It would require an extremely high level of in-house expertise in ADP system design, programming, systems accounting, telecommunications, and related disciplines.

A substantial amount of time and money would be spent studying all the various types of ADP equipment currently used in the field offices and evaluating their compatibility and processing capabilities.

There would be potential for internal disagreements between the finance staff, the ADP staff, and the ADP contractor until responsibilities and authorities were clearly established.
Alternative 2 probably could not be fully implemented by the October 1, 1988, deadline established by the department.

There would be no significant reduction in costs through automation. A reduction in staffing from approximately 200 FTEs under alternative 1 to about 194 FTEs under alternative 2 would be offset by an anticipated $360,000 per year increase in ADP operation and maintenance costs.

The development of an up-front system would be a problematic undertaking with a high risk of failure.

The Bureau of Mines FAMIS II system was essentially an up-front system which did not work out. Other Interior bureaus have had (and are continuing to have) problems getting the financial information in their up-front systems to reconcile with their official accounting records.

There may be hidden costs which are not included in the estimates. Since the data entry function would be transferred to the field offices under this alternative, those additional responsibilities might translate into additional administrative costs in the field areas. Certainly the telecommunication costs in parks could be expected to increase significantly.
Alternative 2 would probably be the most difficult for the Central Finance Office to implement because of the technical expertise needed to carry out all the system modifications proposed. Since other Interior bureaus with reputations as "ADP giants" have had problems with up-front systems, the National Park Service's chances of success do not look good.

Alternative 3. Decentralized preparation of paperwork, decentralized data entry, centralized payment and accounting, centralized reporting. Contracted ADP services to be provided by another Interior bureau. Periodic on-line transmittal of internal reports to field offices, capability for field offices to print reports on a slave printer.

Estimated FTEs: 130 in central office, 5 in each region, 7 in headquarters policy office

Estimated operating costs: $4,390,000 in central office, $150,000 in each region, $363,000 in headquarters policy office

Estimated implementation costs: $3,940,000

Both the staffing levels and the ADP systems would be similar to those described for alternative 2. The biggest difference is that alternative 3 would resolve the nagging questions about the National Park Service's in-house ADP expertise by contracting out all ADP work to another
Interior bureau with experience in finance office consolidations. The ADP implementation effort should be much easier under alternative 3 than under alternative 2.

While it couldn't possibly become effective immediately, sometime after finance office consolidation (perhaps by FY 1991) each field office would have terminal access to the contractor bureau's ADP mainframe and could input financial information directly into the accounting records and query any financial information it needed at any time on a "read only" basis. Thus, there would be no need for a data entry function in the Consolidated Finance Office, but the central office staff would have to do a thorough job of reconciling hard-copy documents with the data entered by the field.

The advantages of alternative 3 include the following:

The greater availability of current information and the smoother year-end closing process would be the same as described for alternative 2.

Extensive study of existing ADP equipment in the parks could be postponed until the Consolidated Finance Office was up and running. Since a contractor bureau's mainframe would be used to process finance office transactions, ADP equipment in the field that was not compatible would have to be replaced. Many of the compatibility problems the central office would face under alternative 2 would be transferred to the field offices under alternative 3.
This alternative would make use of the wealth of ADP experience available in other Interior bureaus.

There would be less duplication of ADP mainframes executing similar financial applications and programs within the Department of the Interior.

By contracting out its ADP functions to an independent bureau, the Central Finance Office should be able to avoid some of the potential for internal disagreements between its finance staff, its ADP staff, and the private ADP contractor. This would be particularly true if the contractor bureau's ADP division had no base funding, thereby forcing it to be user responsive.

The disadvantages of alternative 3 include the following:

It would be very expensive to implement and maintain.

It might result in duplicated ADP equipment in some field locations.

Extensive retraining of finance office and field personnel would be needed.

Remote key entry from field offices would substantially reduce the central office's control over the input to the official accounting records.
Alternative 3 could not be fully implemented by the October 1, 1988, deadline established by the Department.

There would be no cost savings from database automation of finance office functions. While alternative 3 would reduce the total required staffing level to about 177 FTEs, it would require more money to operate than alternative 1, which proposes no ADP enhancements.

Probably the biggest issue regarding alternative 3 is the Department's FIRM study. This study makes it impossible to justify incurring substantial ADP development costs to upgrade any current departmental accounting system when it might be replaced on October 1, 1989. Any decisions about contracting out ADP services should be reviewed by the Department to ensure that the National Park Service does not incur high ADP implementation costs to operate a system that will be scrapped a year later.

**Alternative 4.** The entire operation of the consolidated finance office contracted to another Department of the Interior bureau.

**Estimated FTEs:** 29 in central office, 5 in each region, 7 in headquarters policy office

**Estimated operating costs:** $4,292,000 in central office, $150,000 in each region, $363,000 in headquarters policy office

**Estimated implementation costs:** $3,410,000
Because there is no comparable administrative setup anywhere in the Department, it was difficult to estimate what contracted finance operations would cost the National Park Service. An estimated cost of $600,000 per year for contractual ADP services and $2,600,000 for contractual finance office services was based on a Bureau of Mines average cost of processing one transaction (about $8.67) multiplied by the 300,000 transactions expected in the NPS Central Finance Office. The Bureau of Mines cost figures were chosen because they were the lowest of any Interior finance office reviewed during this study. (If the National Park Service was to contract out the operation of the Central Finance Office, presumably the low bidder would get the job.)

Alternative 4 has all the advantages of alternative 3 plus the following:

There would be a greater proportion of professional staff to clerical; consequently, there would be less staff turnover.

Alternative 4 has the same disadvantages as alternative 3 plus the following:

This alternative would have a very disruptive and detrimental effect on the lives of current NPS finance office employees.

This alternative would probably be the most acceptable to the Department because it is the only one that would reduce the total staffing level below the 165 FTEs they have required and because there would be one less financial accounting system to convert to the FIRM system.
Summary. In the short run (that is by October 1, 1988) it is clear that there is no way the National Park Service can effectively accomplish any method of consolidation other than alternative 1 or a modified version of alternative 1. The other three alternatives are clouded with questions as to how long it will take to acquire the needed ADP equipment, how long it will take to write the necessary applications programs, how long it will take to get all the proposed ADP enhancements installed and fully operational at 350 remote locations, whether or not ADP equipment acquisitions will be compatible with any of the National Park Service's existing equipment, whether or not some savings in equipment acquisition costs are possible through coordinating ADP purchases with purchases for the maintenance management system or other programmatic ADP projects, and what effect the proposed study of the Department of Agriculture's property management and finance systems will have on any ADP decisions regarding the Central Finance Office. In addition, it makes absolutely no sense to pour a lot of money into enhancing any of the existing accounting systems in the Department of the Interior when the departmental FIRM study may make all of them obsolete in a few years.

PERSONNEL

General

The National Park Service's organization for personnel management is designed to service a large number of field areas and a highly seasonal
workforce. As such, authority for the personnel management function is largely decentralized. Basic authority is delegated to the regional offices, the service centers, and in some cases, individual parks. While there may be variations in the type and level of authority delegated, a personnel management program normally includes the functional areas of position classification, recruitment and staffing, employee and labor relations, and personnel records and processing. (Employee development and equal opportunity are addressed separately.) Delegation of personnel management authority to the regions began in the 1950s and currently includes authority up to the GS-14 grade level. Further delegations to parks range from GS-4 through GS-13, depending on the park's size and geographic location.

As part of the review of the personnel function, information was obtained from several Interior bureaus and the U.S. Forest Service. Their organizational structures varied from a highly centralized administrative service center to a state-by-state organization. Most of the bureaus delegated personnel management authority at the GS-13 and GS-14 grade levels. Most were moving toward further centralization of personnel authority as their resources continued to be reduced. All stressed the need to further automate personnel processes to achieve increased efficiencies in operations.
Classification and Position Management

Current Status, Resources, and Organizational Requirements. The ten regions vary considerably in their classification and position management delegations. In some, all classification actions requiring adjudication are forwarded to the regional Branch of Classification; in others, large parks have complete authority to classify all seasonal and permanent positions through the GS-11 level. Delegation levels are largely influenced by park size, amount of personnel activity generated, and distance from the regional office.

The majority of classification actions, position descriptions, evaluation statements, and reports and analyses are currently done manually. None of the regions fully utilize the full potential of computer applications that are feasible in the areas of classification, position management, and pay administration. Examples include a "menu" of duty statements and other factors which could be used to prepare position descriptions, an SF-52 log and audit tracking system, and a system to compute average grade, supervisory ratios, etc. A number of the regions are hampered by the lack of hardware and funds to purchase it, and many of the parks do not have compatible systems.

Position numbering systems are used to readily identify and differentiate among categories of positions in order to track FTEs and manage programs. The methods employed vary from region to region. Some numbering systems are driven by budget and assigned by that function,
while others are based on classification, staffing, or even individual parks. If management analysis needs are to be met and the costs associated with various programs are to be ascertained, then consistency is necessary servicewide.

**Alternatives.** The following alternatives were considered:

1. Consolidate the classification function in three super regions or in an administrative service center.

Advantages would include (1) improved compliance and consistency in the application of classification standards and thus in the grading of positions, (2) more opportunity for the utilization of computer applications that would lessen the amount of staff time currently expended, and (3) possible substantial cost savings, both from a fiscal and FTE standpoint. The disadvantages would include (1) lengthy time delays in processing actions, (2) impersonalization of service, and (3) difficulty in prioritizing actions among regions. A number of operating officials expressed satisfaction with the personal service afforded them by a personnelist who is conversant with the specifics of individual positions, historical background of the organization, and the needs of management. Superintendents, in particular, expressed significant concern that the establishment of a super region personnel office or administrative service center would result in loss of familiarity.
with program areas and the removal of responsibility for actions.

2. Implement a servicewide position numbering system.

As it currently stands, it is difficult to identify like positions and associated costs even within regions. A consistent system will allow management to analyze programs and forecast organizational needs.

Recruitment and Staffing

Current Status, Resources, and Organizational Requirements. Generally, recruitment and staffing authority is delegated to the extent to which qualified personnel specialists and assistants are available in the parks. Several regions have formally documented these delegations, but others have not, largely because the delegations change rather often based on the demonstrated ability of individual personnel specialists and assistants.

The efficiencies of scale occur in staffing as in any similar operation. The regions understand that, on the one hand, as authority flows to lower levels, it typically requires a greater number of people to supply that service. On the other hand, the quality of service and immediacy of response are improved when the service is decentralized to the lowest possible level.
One area in which some centralization of staffing functions exists is in the development of seasonal registers. The Service recruits for its substantial seasonal workforce of rangers and laborers in a number of different ways. This practice has been confusing to applicants and is possibly not cost effective because of the many duplications.

The regions identified several problems with the centralized process for recruitment and staffing for ranger positions. One is that the law enforcement registers contain too few names, a problem they say we bring upon ourselves. Regional staff know of applicants with extensive experience and high qualifications, but NPS requirements for in-house experience, background, and training unnecessarily handicap recruitment efforts. Potential applicants with significant military, state, and federal law enforcement experience are prevented from applying by overly strict criteria. The regions feel that the Service needs to look at the qualification requirements to see if they can be modified to take greater advantage of the supply of trained and experienced people.

Other identified problems centered on the application forms, the manner in which the Washington Office accepts late applications, the acceptance and rating of forms lacking necessary certifications, and the problems created when parks receive supplemental lists of applicants following the issuance of the first (primary) lists. Serious questions were raised about the costs involved in accepting, rating, and listing large numbers of seasonal ranger applications (new hires) for a relatively small number of openings.
Two regions perform their own centralized acceptance and rating of seasonal laborer applications, four have the WASO office perform that function for them, and two split the process, with the regions doing some and the big parks doing their own. The Alaska Region has local hire authority, which it uses to fill many laborer jobs. The regions that do their own recruiting reported satisfaction with the process and no desire to further centralize the effort. The workload is not insurmountable, and the parks like the service and the consistency of the registers they receive. Those regions that use WASO to handle their seasonal laborers reported equal satisfaction with that process, since it relieves them of a workload effort that they would find difficult to assume. They identified no specific problems.

Those parks currently using the Washington Office for recruitment of laborers were most in favor of a centralized system, since they recognized the differences in regional operations and the possible confusion for applicants. Those regions operating a regional or region/park system were strongly in favor of decentralization, since it was operating well, was understood by the parks, and was meeting their needs without being an excessive workload problem. One region argued that the move to centralization might continue a trend it saw as disturbing: the need to file earlier and earlier for consideration.
Employee and Labor Relations

Current Status, Resources, and Organizational Requirements. The employee and labor relations program in the National Park Service varies greatly among the regions in both level of activity and organizational structure. It is often integrated, either in combination or separately, with other personnel functions.

The nature of the employee and labor relations program is essentially one of counseling and advisory services involving frequent individual contact with supervisors, managers, employees, and third parties (employee representatives, attorneys, union officials, etc.). Delegations to the parks are fairly restricted, which reduces opportunities for direct and frequent contact between the employee and labor relations staffs and the people they serve in the parks.

Alternatives. A wide range of potential organizational and structural alternatives can be considered for these functions.

1. Split the functions, combining employee relations with a function such as management reviews and combining labor relations with a function such as classification.

2. Contract out the employee benefits function or absorb it into a consolidated administrative services unit.
3. Centralize the employee and labor relations program, or parts of it. For example, the labor relations function could be centralized in the Washington Office for all regions except the National Capital Region, since that function for all other regions is no more than a part-time activity.

Personnel Processing and Records

**Current Status, Resources, and Organizational Requirements.** Personnel processing, including PAY/PERS input, is performed at 24 NPS locations (WASO, 10 regional offices, Harpers Ferry Center, and 12 parks). All offices and parks submit SF-52s (Request for Personnel Action) to one of these 24 service offices for input into the Bureau of Reclamation's PAY/PERS system in Denver. In most regions SF-52s are sent by mail, but in at least one region all park locations have the capability to transmit SF-52s electronically overnight. Other regions, while interested in electronic transmission, reported that their efforts are hampered by a lack of compatible equipment and erratic phone lines.

Input into PAY/PERS is accomplished using a variety of ADP equipment. For the parks, transmission is through regional office ADP systems. Increased guidance and instructions on processing, record keeping, and PAY/PERS and payroll related matters would enhance the efficiency and accuracy of the current system.
Personnel records are retained at the office having delegated personnel authority to effect personnel actions, since access to the records is necessary to properly process the actions. Therefore, the structure of the processing and records operation depends on the delegation of staffing authority. When employees at outlying locations wish to review their records, the records are sent to the supervisor/administrative officer at the employee's worksite. Such transfer of records makes them vulnerable to inadvertent violations of the Privacy Act and of record-keeping regulations.

Payroll

Even with the consolidation of payroll in the Bureau of Reclamation, NPS staff are needed to interface with Reclamation's Division of Payroll Operations on payroll matters, procedures, and problems; to process time and attendance; and to provide advice and guidance to employees. In the majority of cases, full-time positions are not established for this function; rather, the work is absorbed by personnel office staff. For most NPS locations, time and attendance data are input by timekeepers in operating offices and transmitted electronically via regional office ADP systems to Reclamation's Division of Payroll Operations for processing and payment.
Computer Applications in Personnel

Information Distribution. Data transmission through the telephone lines has proven very cost-effective and an efficient way of distributing information. For example, vacancy announcements can be input to a computer system at the region and field level and transmitted to other park areas and other regions with compatible computer hardware. Greater use of this computer and electronic capability will require considerable effort to review equipment and purchase hardware, but most regions are acquiring such hardware in any case, and it only makes sense for them to have compatible equipment.

Common Data Base. Common data bases are becoming more popular. They eliminate the need for each function of personnel to enter the same information as another function. Several software programs have been developed that extract information from common data bases in personnel. For example, software for a historical performance appraisal system utilizes the social security number, employee name, organization code, and position number from one data base and combines and manipulates the data into the format required for comparison and analysis. The hardware setup of each region currently makes it difficult to create a common data base. A servicewide computer hardware system is needed, and employees need to be trained in system operations.

Calculations Software. Computer software has been developed and utilized by several regions and agencies in the Department for complex
computations, such as retirement and service computation date calculations. It is increasingly evident that a servicewide computer network is necessary to achieve further efficiencies in operation. Until that becomes a reality, however, regions will have to do the best they can to develop their own systems. What is feasible for one region from a fiscal, technological, and programmatic standpoint may not be workable for another. Regions possessing applicable systems may wish to assume a lead role in developing programs that have been identified as viable products for their purposes. The availability of these programs should be publicized to other regions.

Although computer hardware varies in each regional personnel office, a majority of personnel offices have access to an IBM or an IBM-compatible personal computer. Designing software programs to operate on the IBM PC will allow the various personnel offices to share software. Off-the-shelf programs offer another excellent source of software that can be utilized for personnel applications.

Long-Term Computer Applications. Technological advances in the last 20 years have dramatically altered methods of conducting personnel and equal opportunity functions. The next 20 years will see computer technology such as artificial intelligence, infrared transmission of data, voice activated computers, teleconferencing networks, and many other innovations yet to be conceived. The National Park Service should start now to develop a plan to take advantage of these new technologies. The technology to support centralization will allow a concentration of expertise
in fewer areas and result in improved efficiencies and effectiveness within the organization.

EMPLOYEE DEVELOPMENT

Current Status, Resources, and Organizational Requirements

Training in the Service began principally as skills training for park rangers but has evolved into management and employee development in a wide range of professional fields. In FY 1986 the Service spent $5.3 million to provide training opportunities for 17,747 individuals. Of that amount, $3.3 million was spent on tuition, travel, and per diem.

The structure for delivering training is composed of a WASO Employee Development Division, two servicewide training centers, training staffs in each of the 10 regional offices, the Denver Service Center, and the Harpers Ferry Center, and training coordinators in some parks. Both the Employee Development Division and the Personnel Division report to the assistant director for personnel and administrative services. A Washington Office Training Development Review Board reviews overall training within the Service. Training is managed by 47 permanent employees, of which 55 percent are in the Employee Development Division and the training centers, and 45 percent are in the field.
Managers responding to the questionnaire said that although there needs to be a great deal of coordination and communication between the Employee Development Division and the Personnel Office to meet overall career development needs, the two divisions should remain separate. They also reported that although consistency in the structural alignment of the ten regional offices would be desirable, it is not necessary.

Management is concerned that training does not reflect management objectives and is not preparing us for the future. The status of management development concerned many of the managers surveyed. Their concerns fall into three areas: (1) that the Service is not identifying personnel with management potential, (2) that not enough management training is offered, and (3) that more emphasis is needed on training in interpersonal skills, communication, team building, stress management, dealing with change, and working with constituency groups and the press. They recommended the immediate implementation of the management development program designed by a task force in 1985.

EQUAL OPPORTUNITY

Current Status, Resources, and Organizational Requirements

The equal opportunity function is a management advisory function generally in a staff position to the director or the regional director. This is the case with few exceptions throughout the Department of the Interior.
At the current time the equal opportunity program is semidecentralized. The principal areas of program responsibility in the Washington Office include the discrimination complaint process, affirmative action program, and various special emphasis programs. Each region has an EO manager who is responsible for the regional EO programs. Regional EO managers report to the regional directors on a day-to-day basis, but for personnel management and programmatic issues they report to the EO manager in the Washington Office. Such a relationship has, at times, caused confusion and communication concerns among those involved. Many field units utilize an EO committee as the principal vehicle for communicating issues and implementing program objectives with varying degrees of success. Oftentimes such committees have taken on an expanded role in the organization and have served as a communications bridge between management and employees.

Minimal progress has been made in the effort to improve the percentage of minorities in the NPS workforce. Women have made progress in terms of both total numbers and average grade. A bureau-by-bureau comparison within the Department shows that the National Park Service has the highest minority population other than the Bureau of Indian Affairs. Compared to governmentwide statistics, however, the Service falls short in most minority groups. Affirmative action efforts have been limited by continual budget reductions, priority consideration eligibles, the centralization of OPM recruitment authorities, and veterans preference.
On October 1, 1986, the Department decentralized the Complaints and Adjudication Branch dealing with the investigation of complaints of discrimination. The National Park Service now has the responsibility for accepting (or recommending rejection of) and investigating all new complaints of discrimination filed against it. The Service has chosen to contract out the investigations and has recently awarded the contract. This will put the financial responsibility on the region, service center, or park from which the complaint originates. Costs include the travel and services of the contractor and the expenses of the court report. When the contractor has been assigned a complaint case by the Washington Office, the regional EO staff will be responsible for advising all parties about the scheduled investigation, arranging for appropriate interviewing facilities, and securing the services of a court reporter.

The Washington EO Office is currently behind in the investigations pending. Once a complaint has been accepted, the agency is allowed 180 days to process the investigation and issue a finding. At this time the majority of complaints have exceeded the 180-day time frame, which technically allows the complainant to go directly to court, although most complainants do not do so.

The contract on investigations, which was awarded in April 1987, should eliminate the current backlog. The EO specialists on the WASO staff all have extensive backgrounds and experience in investigative procedures.
Alternatives

1. Decentralize the EO Office investigation process and delegate all responsibilities to the regional offices.

The regional directors and EO managers would either have an EO specialist conduct the investigations or contract them out. The cost of investigation would continue to be the responsibility of the division or park from which the complaint originated.

Staff resources and expertise would have to be increased if the adjudication of complaints was decentralized to each region. Although such increases might be offset by more timely settlement of complaints and result in reduced payments on settlements because of the timeliness factors, the regions do not have the funding and FTEs needed to accomplish this function.
The Mission 66 program was the first major NPS initiative to repair deteriorating facilities. Through the 1960s appropriations for the NPS construction program (which included both new construction and major repairs to existing facilities) were in the range of $45 million to $60 million each year, and many projects were completed. However, the annual maintenance programs were not increased, so facility deterioration was not abated. Another surge of building and improvements to the parks' physical plants came in preparation for the Bicentennial in 1976. During the 1970s there was increasing concern about the safety of park facilities as many roads, bridges, trails, and water systems built in the 1930s reached the end of their useful lives. Through the 1970s and early 1980s the construction program was in the range of $50 million to $150 million each year. In addition to rehabilitating many existing facilities, these programs also created new facilities that were to require additional maintenance funding. In 1982 the Service embarked upon the park restoration and improvement program to bring deteriorated facilities up to standard. Once again major funds were earmarked for rehabilitating facilities to meet basic health and safety requirements. The program succeeded in correcting some of the most obvious and serious deficiencies.
The major task now confronting the Service is to reverse the gradual deterioration of the newly restored physical plant. A task force convened in 1984-85 to study the long-term maintenance needs of the parks concluded that a sound system of preventive maintenance at the park level, funded at $210 million annually, supplemented with a cyclic maintenance program fully funded at $75 million annually, would avoid a recurrence of the situation that led to the necessity for the park restoration and improvement program. In this vein, in 1985 the Service undertook the design and implementation of a maintenance management system to improve the planning and performance of maintenance activities in the parks. Similar estimates for cultural resource preservation needs totaled $29 million annually, and for natural resource preservation needs, $16 million annually.

**Current Status, Resources, and Organizational Requirements**

Maintenance is the largest program in park operations in terms of budget.

Congress (in Public Law 98-540, October 24, 1984) has directed the Service to implement a maintenance management system. In response to this legislative mandate the Service has awarded contracts for the purpose of developing individual park maintenance systems. Approximately $1.8 million has been spent to develop and implement the system. An additional $5 million has been programmed for completion.
As outlined in the *Maintenance Management Update*, January 1987 issue, Maintenance Management is designed to identify and address maintenance needs more efficiently and effectively. The goal is to enable the staff to best use its people, time, money, and equipment. Many state and local public works departments in the United States and overseas have been able to significantly improve their maintenance operations with management programs similar to the one that the NPS will be using.

The project, which began last summer, will take about three years to complete. One of the most significant aspects of Maintenance Management is the large number of Park Service employees involved in developing the program. Staff from each park area will help ensure that the needs of their own park areas are addressed.

In addition to contracting with consultants, the Washington Office has established servicewide steering and technical review committees. Project coordinators serve as the principal liaison between the consultants, parks, and servicewide committees. Also, a comprehensive training program is being conducted for the benefit of regional and park personnel. The target date for placing all parks except those in the National Capital Region on line is 1989. National Capital Region has a separate contract, and all of its parks will be on line by the end of 1987.
It is anticipated that the application of the primary elements of the maintenance management system will result in a most efficient organization for each park. These organizational alignments and better defined workloads will influence maintenance organizations in the regional offices, the maintenance assistance unit in the Denver Service Center, and the WASO maintenance assistance unit.

Regional office questionnaire responses indicated that only three regions receive maintenance assistance from other regions, the Denver Service Center, or other offices. The regions appear to be satisfied with WASO engineering and maintenance office assistance.

Parks responded that maintenance was the most used skill from other parks. Over one-third of the parks did not know about the WASO maintenance assistance unit. Half the respondents (107) had used the services and were basically satisfied. The services used most were HVAC (heating, ventilating, air conditioning), electrical, and telecommunications (radio and telephone).

**INTERPRETATION**

The objectives of interpretation are (1) to foster public understanding and appreciation of national parks and their significant cultural, natural and recreational values, (2) to encourage and facilitate appropriate, safe, minimum-impact use of the parks, (3) to promote public understanding
and acceptance of the Service's policies and management programs, and (4) to express and nurture the underlying values of this country.

Ultimately, the success of any park management program depends on informed public support. Interpretation in the field, with its informational, orientational, and educational programs, is the most effective way for management to communicate with the public. Interpreters provide information to park visitors, prior to and during their visits, about the options open to them while visiting the park. Information may be included about special environmental conditions or regulations and specific safety hazards. By making visitors aware of their surroundings, visitor impacts on resources are decreased, as are visitor accidents. In many cases, interpretive programs provide the only contact visitors have with park personnel.

Current Status, Resources, and Organizational Requirements

An assistant director for interpretation was recently established in the Washington Office. This office also supervises the Harpers Ferry Center. All regions have chiefs of interpretation, but there are considerable differences among regions in the number of professionally trained and experienced support staff.

The Service operates a volunteer program to provide services to park visitors that would otherwise not be available, to assist park management
in accomplishing a great amount of maintenance, resource management, and other work that otherwise would not get done, and to otherwise better serve the public and preserve resources at a minimum cost to taxpayers. The program utilizes interested citizens who are willing to donate their time and expertise to perform a variety of activities in the parks. Legislation prohibits the displacement of permanent and seasonal employees by volunteers, but within that constraint, thousands of people have contributed their time and talent to help the Service accomplish its mission. In fiscal year 1986 individuals contributed almost 66 million hours of work valued at $16 million.

Annual allocations of funds appropriated under the volunteer program are controlled at the WASO level and are allocated on the basis of annual regional requests in the parks program. The records show that roughly the same amount has been allocated to each of the regions over the past several years.

Nine of ten regions reported that a majority of parks have a current statement for interpretation. There is total compliance in two regions. In five regions approximately one-sixth of the parks do not have a current statement. The overall degree of noncompliance is 18 percent. Servicewide, smaller parks have the highest degree of noncompliance.

Five regions provide parks with information and guidance on visitation profiles that might affect their interpretive and visitor services programs. Most parks also use the DSC statistics to a certain extent. Servicewide,
half of the parks said they make changes in their programs relative to visitor demographics and patterns of variation. The larger parks seem to be more likely to make organizational or program changes based on changes in demographic or visitation trends.

In an attempt to learn more about visitors, their needs, and ways to better serve them, the National Park Service has initiated a visitor services project commonly known as "visitor mapping." The purpose of this project is to develop a practical method that park managers can use for gathering information about visitors and visitor services. The project began in 1982, and work has been conducted in several areas of the park system, including the Pacific Northwest Region. The project has had numerous sponsors, and resources have come from several cooperating associations and concessioners, as well as from within the Service. To date, five parks have participated in this program, and additional parks will have completed individual projects in cooperation with cooperative park study units by the end of FY 1987.

The following concerns and recommendations were made in interviews with WASO officials responsible for the Service's interpretation function at the national level:

Managers should stress the fundamentals of interpretation as established in NPS-6.
The needs of special populations should be integrated into ongoing programs at all levels of the Service.

Managers at all levels must better coordinate interpretation with other functions, particularly resource management, maintenance, and ranger activities. The objective of improved coordination is to more fully inform the public about the full range of issues the Service faces and how those issues affect public resources. The field interpreter will have the longest lasting effect on visitors. Consequently, the future of national parks rests in the competency and caring of those people the National Park Service hires and trains to be interpreters. Every employee in contact with the public should be able to talk intelligently about resource management, research, maintenance, and other issues while telling the park story. The fundamental way to strengthen the linkage between resource management, research, and interpretation is through frequent discussion and collaborative decision-making between these disciplines.

The significance of park-related resources outside park boundaries should be interpreted.

Research should be performed by park interpreters at the park level.
Loss of park historians has had a major impact on interpretation of cultural resources.

Interpretation has been given increased emphasis without changing staffing.

Park and regional managers need to consider building the seasonal interpretive workforce.

The visitor-mapping program is an excellent tool for use in strengthening park programs. It can be implemented by park staff and should be integrated into park plans and operations.

Interpreters, managers, and supervisors at all levels in the Service should commit themselves to developing interpretive and visitor service personnel.

Concessions have a role in interpretation, and it needs to be clarified to all employees.

Management should seek out and facilitate private sector involvement in the interpretive program; however, the nature and scope of involvement must relate to the purpose of the park and to NPS policies.
Resource managers should transfer information to the interpretive staff for use in enhancing interpretive programs and visitor awareness of resource management concerns.

Generally, the interpretive staff in most regions and in most parks is not sufficient to carry out the program. In some cases there are nonprofessionally trained and inexperienced personnel in positions central to ensuring quality planning, programming, and program execution in parks. Park interpretive staffing should be sufficient to allow interpreters to devote full time to providing quality service. With so many collateral duties it is difficult for full-time career interpreters to know just when their full attention can be devoted to achieving excellence as interpretive specialists.

RANGER ACTIVITIES

The primary objective of the ranger activities program is to provide for the security of park visitors, employees, and the property and resources of the national park system. As visitation levels increase, the Service's responsibilities for ensuring a safe, secure park environment have grown more numerous and complex. These responsibilities include law enforcement and traffic control, emergency preparedness, search and rescue, supervision of recreation, issuance of permits, collection of recreation fees, and occupational safety and health.
Law enforcement and protection activities include visitor, facility and resource protection; criminal investigations, patrol, apprehension and arrest; crowd control; special security; drug and vice control; and visitor assistance. Park rangers with formal law enforcement training perform the full range of professional law enforcement functions throughout the national park system with the exception of the metropolitan Washington D.C. area and sections of two large urban parks (Gateway National Recreation Area in New York and Golden Gate National Recreation Area in San Francisco), where the U.S. Park Police have law enforcement responsibilities.

Current Status, Resources, and Organizational Requirements

Fire management and special use regulation were the areas of greatest concern identified in the responses to the park and regional questionnaires and in interviews with WASO managers. Many respondents commented that the regional workload in these areas has increased tremendously in recent years with no proportionate increase in regional staffs. These functions are often assimilated by the regional staffs in a fragmented way, and in some instances as collateral duties rather than as full-time responsibilities. In particular, the need for structural fire specialists at the regional and WASO levels was emphasized.

Concern was expressed that rangers at the regional and park levels are encumbered with too many new programs and responsibilities, such as
wilderness management, grazing, aviation, diving, and integrated pest management. It was suggested that better position management in these new emphasis areas, coupled with more uniformity in regional office organizations, would provide for better performance of these collateral duty assignments. There was also some feeling that funds directed toward the resource management trainee program could be better used to improve the skills of current GS-025 and GS-401 series personnel in resolving resource-related problems.

With regard to the servicewide training backlog in law enforcement, in 1986 only 90 of the 360 applicants received basic law enforcement training. As of October 1, 1986, the total backlog was estimated at 270 people, but this figure does not reflect those who needed the training but who did not submit applications. So far in 1987, 140 persons have received this training. A more serious backlog may exist in supervisory training. This training has not been offered in the last two years and it is not expected to be given this year.

**RESEARCH AND NATURAL RESOURCE MANAGEMENT**

In the early days of the park system, protection of natural areas meant not only trying to keep development, grazing, timber cutting, mineral exploration, and other economic activities out of the parks, but also eliminating natural elements perceived as undesirable or damaging, such as fires, insects, diseases, erosion, and predators. However, in recent
years, park managers have come to realize that these features are integral to the structure and functioning of natural ecosystems, and they have strengthened efforts to keep ecosystems whole and balanced. The Service's natural resource management activities have changed not only to incorporate this new ethic, but also to address new threats. Increases in the number of visitors to the parks and a corresponding increase in their needs for roads, water, sewers, food, accommodations, and recreation services have significantly affected natural resources in the parks. Simultaneously, there is increasing pressure from activities on lands outside the parks. Parks that were once remote are experiencing the effects of polluted air, polluted surface water and groundwater, pesticides, development of mineral resources, and residential and commercial construction. Some of these trends have reduced available habitat for important species and created a need for more intensive management to maintain viable populations of animals being displaced from surrounding lands.

A "state of the parks" report published in 1980 represented the first NPS attempt to quantify these threats. The report generated an increased awareness of natural resource problems and the need for solutions. As a result, funds were appropriated to address the most significant resource problems. More training in natural resource management was developed, and park managers were directed to prepare resource management plans. At the national level, the Service established a centralized technical assistance capability to address air quality, water resources, mineral development, and water rights issues.
In the future, many of the problems that will have the most significant impacts on park resources and, indirectly, on the recreational value of the natural areas in the parks, will be environmental and economic issues of a regional or national scale. As impacts of surrounding development on park resources increase, a greater understanding of individual and cumulative impacts will be critical to the long-term survival of park resources. Research and monitoring will be important, as well as improved coordination with other land-managing agencies, local governments, and certainly regulatory bodies at the regional level.

Current Status, Resources, and Organizational Requirements

The major concern expressed by both the parks and the regions related to the parks' needs for technical assistance in dealing with natural resource matters. In the responses received to the park questionnaire, 88 percent of the parks expressed a need for technical assistance in implementing projects identified in approved resource management plans. The professional/technical assistance needed by parks in carrying out resource management projects is related to park size and type, and possibly to the backgrounds of the park personnel. In the larger natural parks, where the staff is trained in natural resource issues, the assistance needed relates to biological resources, such as fish, wildlife, and vegetation. In the smaller historical or cultural parks the assistance required relates principally to historical and cultural issues. The regions confirmed the need for natural resource management assistance and
hands-on scientific assistance. Although many scientific disciplines are represented on the regional office staffs, they are insufficient to meet all park needs. Coupled with this, the regions noted that the Washington Office is managing money that is used for park-level work, such as air, water, and minerals projects. They felt that these should be regional office functions and that the Washington Office should be confined to policy development.

Another problem identified through the questionnaires is that cooperative park study units are not universally understood and applied throughout the Service. Although the philosophical, personnel, and financial commitments to university-type contracts differ immensely among the regions, most agreed that both university talents and other interagency agreements must be nurtured through schedule A appointments, contracts, or cooperative park study units.

All parties agreed that research must precede and become the basis for managing park resources. Essential to this is the process of technology transfer, whereby research results are communicated to operational staff for application in problem resolution. However, the implementation of a management plan need not always await the amassing of new information on a recurrent problem.

Research need not always be conducted by research scientists. Research requires planning and leadership from professional scientists, but professional park employees can make significant contributions to basic data gathering and interpretation.
CULTURAL RESOURCE MANAGEMENT

Of the 145 units of the system added since 1962, half were established primarily to preserve and interpret historic and prehistoric resources. These new units have expanded the Service's interpretation of American history well beyond the traditional emphasis on political and military affairs. A few of these cultural areas, like the Chesapeake and Ohio Canal National Historical Park, with its 185-mile towpath, and Klondike Gold Rush National Historic Park, with its Chilkoot Trail, offer active recreation. Most, however, provide for stimulation of the mind and senses through the heightened awareness of the people, events, and places that have shaped America.

The major initiative designated as the regional resource summary and action program has provided a specific analysis of the status and the organizational and structural requirements for an effective cultural resource management program. The magnitude of the cultural resources managed by the Service was identified through this program as follows:

**Structures:** Some 15,267 structures of known cultural significance were identified by the regions, servicewide. The ratio of prehistoric structures to historic structures is approximately 1:10. Fully 52 percent of these are nationally significant, 9 percent are state or regionally significant, and 15 percent are locally noteworthy. However, 24 percent of all known structures have never been evaluated for significance. The condition of 31 percent of the
structures is generally good, 40 percent are in fair condition, 14 percent are in poor condition, and the condition of 15 percent is unknown. Of the nationally significant structures, 47 percent are in fair condition and 13 percent are in poor condition. The primary sources/causes of the poor condition of structures are structural and material deterioration, vandalism, and erosion.

Sites: The Service manages 36,689 cultural sites covering a 811,597 acres. The ratio of prehistoric sites to historic is approximately 4:1. To date, only 14 percent of the total park area within the administrative purview of the Service has been surveyed.

Of the known 36,689 sites, roughly 58 percent are prehistoric, 13 percent are historic, 3 percent are a combination of prehistoric and historic, and 28 percent are of unknown period (that is, the Service is aware that a site exists, but it has not had the staff or funds to fully evaluate the resource). Unevaluated sites represent a significant problem in the western regions.

The condition of known sites varies widely, although the clearest message is that the condition of most (58 percent) is unknown. Of the remainder, 27 percent are in good condition, 9 percent fair, 5 percent poor, and 1 percent destroyed. The poor condition of most sites is attributable to natural erosion, vandalism, looting, and operations and development by the Service itself.
The National Historic Preservation Act of 1966, as amended, has enabled the Service, in cooperation with the states and other federal agencies, to provide for the protection and preservation of the nation's historic and prehistoric heritage. The result has been a significant expansion of citizens' awareness, appreciation and use of America's cultural resources, and a recreation opportunity that has grown substantially over the past 20 years. Under this landmark legislation, the National Register of Historic Places, which is maintained by the Service, has been greatly enlarged to encompass some 43,000 properties of national, regional, state, and local significance. Matching service grants to state historic preservation officers have supported state historic preservation programs, surveys and plans, and property acquisition and development. Under section 106 of the National Historic Preservation Act, properties on or eligible for the National Register are given an important degree of protection against impairment by federal undertakings. Since 1976 the federal tax code has encouraged historic preservation by commercial interests. Total investment in the rehabilitation of historic properties under this program has been in excess of $7 billion. The Archeological and Historic Preservation Act of 1974 requires federal agencies to protect or recover, where appropriate, archeological sites and data threatened by federal undertakings. The Archeological Resources Protection Act of 1979 called for regulations against the looting of archeological sites on federal land and provided for stiff penalties. The effect of these provisions has been to increase awareness and appreciation for cultural resources and environmental amenities. As one result, visits to preserved and restored historic structures, sites, and districts have become a major leisure-time activity for Americans.
Parks responding to the questionnaire expressed the need for regional professional and technical assistance in implementing resource management plans. Cultural resource skills were most often requested by small historic parks. The parks made the following additional points:

The high percentage of current scope of collection statements mostly reflects the efficacy of the inspector general's reports on NPS curatorial weaknesses. Without this pressure, priorities might have been (and perhaps should have been) directed to more publicly visible resource neglect.

The current exchange of technical and professional skills is encouraging and might be expanded with shared positions.

Cultural resource research is conducted at most parks. The subject areas are only partially defined by the organizational ties of the researchers.

Regional responses to the questionnaire included the following:

Regions receiving National Register services from others are dissatisfied, while the regions providing the services assure that all is well. The value of technical and professional assistance obtained from other regions is not a subject of disagreement.
Regions may require more historic architects to implement the historic leasing program.

Most regions have sufficient staff expertise to cover all responsibilities, but they are less sure they reflect and meet the parks' needs for technical assistance.

Cooperative park study units are active in most regions, primarily in archeology.

The National Capital Region's cooperative agreements with area universities (not technically classified as cooperative park study units) have developed very beneficial research in archeology, historic architecture, and history.

LAND RESOURCES

Background

Prior to 1961 acquisition of land for national parks was accomplished primarily by withdrawals from the public domain, transfers from other agencies, donations, or in a few cases special appropriations by Congress. Since the beginning of the Land and Water Conservation Fund in 1965, the National Park Service has acquired more than 90,000 tracts of land encompassing more than 33 million acres. Only about 2.6 percent
of the nation's land is devoted to national park areas, and park service purchases of private land amount to less than one-tenth of 1 percent of the total land base of the United States.

Between 1965 and 1976 the Service's acquisition program saw relatively steady growth, as new parks were authorized and more funds were appropriated. Between 1977 and 1979 appropriations took a leap as funds were provided for a major expansion of Redwood National Park. In this same time period, landowners who opposed federal acquisitions began to organize, and questions from Congress and the administration prompted several reviews of acquisition policies. While other-than-fee acquisition had been used to some extent throughout the Service's history, more attention was focused on these alternatives as the backlog of land to be protected grew, funds continued to be limited, and new areas were established closer to metropolitan centers. In 1982 a new land protection policy for the NPS established that cost-effective alternatives to direct federal purchase would be used to the maximum extent practical.

Current Status, Resources, and Organizational Requirements

The Land and Water Conservation Fund Act authorized appropriations of up to $900 million per year. While 40 percent is to be available for federal programs, since 1980 appropriations for National Park Service acquisitions have been in the range of $40 million to $150 million per year. At the close of 1986 lands planned for acquisition included 6,385
tracts totaling 331,000 acres, with an estimated price of approximately $436 million. This estimate does not include allowances for Redwood National Park or Alaska park areas.

The service has prepared land protection plans for 184 units containing nonfederal lands within their authorized boundaries. The plans establish priorities for protection, identify the minimum interests that need to be acquired, and discuss various methods of acquisition. There has been considerable progress in exploring how to protect land by cooperation with state and local governments or the private sector.

While many landowners formerly objected to an aggressive land acquisition program, now that funding is limited, landowners are objecting to the present slow pace. Previous acquisitions have helped achieve park purposes and protect key resources. Nevertheless, there is a constant danger that development of nonfederal lands remaining within the parks could damage the most important natural or cultural resources. There will be continued efforts to find creative solutions to land protection problems. However, even the most innovative methods cannot provide a complete substitute for purchases that ensure permanent protection of resources and allow for public access.
SAFETY AND OCCUPATIONAL PUBLIC HEALTH

The occupational safety and health program has been developed around the basic concepts of loss control management. This program emphasizes the identification of the most prevalent causes of accidents resulting in major losses, and the development of specific programs to control or minimize these losses.

The safety function crosses all divisional lines of authority and encompasses all disciplines, activities, and programs. Deficiencies in the program or failure to comply with the standards may result in injury, illness, property damage, or in extreme cases, death. Workers' compensation costs to the National Park Service have been in excess of $2 million per year, while the losses from fire, property damage, and tort claims, and other accident-related expenses are more than four times that amount. It is, therefore, imperative that these losses be brought under control.

Current Status, Resources, and Organizational Requirements

The safety program currently needs trained professionals of many kinds, especially in structural fire, emergency response, and hazardous materials identification and disposal. The skills and knowledge of the current safety community must continue to be upgraded by establishing training requirements and training programs at all levels of the safety operation.
The numbers of accidents from all sources have grown over the past three years, and tort claims and chargebacks from the Office of Workman's Compensation have both increased substantially. At the same time, there has been a significant loss of safety personnel over the past three years, and the workloads of safety personnel and public health officers have risen dramatically. As of March 1987 there were a total of 36 full-time safety professionals authorized servicewide. These positions were distributed equally between the regions and the parks.

Ten U.S. public health officers (engineers and sanitarians) are detailed to the National Park Service under a reimbursable memorandum of agreement between the Centers for Disease Control and the Department of the Interior. The detail has been renewed annually based on a 1955 memorandum of agreement. The program mission is to provide technical assistance and consultation to the Service in all aspects of public health affecting employees and park visitors, with emphasis primarily on potable water systems, wastewater treatment, food service sanitation, and waste disposal. Funds allocated for the program in FY 1987 totaled $651,611, not including clerical assistance, supplies, and materials provided by Washington, the regions, and the parks.

Accident costs have increased over the past few years. Records show that costs related to compensation (doctor and hospital) in 1987 were in excess of $5 million; costs to repair or replace equipment were more than $1 million; tort claims resulting from personal injury or loss or damage to property were more than $350,000, and costs for structural fires were more than $3,000.
Alternatives

1. Retain the status quo in number of full-time safety officers, but ensure that funding is available for the timely training of collateral duty safety officers in accordance with NPS-50.

2. Establish a centralized safety management program administered through zone officers.

CONCESSIONS MANAGEMENT

The concessions management program exists to satisfy a need for commercial visitor services in parks and to protect the best interest of the government against unnecessary financial obligations. In many cases parks are located in remote areas where lodging, food, gasoline, vehicle repairs, transportation, general merchandise, and other goods and services are not conveniently available. Thus, it becomes desirable to have concession-operated facilities within the parks to provide such commercial services to the public.

As of 1985 there were 481 concessioners operating in 115 parks. These concessioners employ approximately 22,000 individuals and reported revenues in excess of $380 million in 1985. During fiscal year 1984 park concessioners contributed $7.4 million in franchise fees, spent over $25 million for construction improvements for visitor facilities and services,
paid over $18 million in federal taxes, and reimbursed the Service for more than $2 million in utility costs.

Current Status, Resources, and Organizational Requirements

All regional offices but one indicated in their responses to the questionnaires that they have sufficient delegated authority to carry out their concession management functions. Some regional offices, however, felt that the delegation was not effective, in that WASO staff approval is required on actions which the regional director has the authority to approve, thereby causing unnecessary delays. The WASO concessions office noted that authority is not fully delegated to the field directorate because of their desire to handle appeals and their involvement with franchise fees, contract renewals, and related requirements.

It is estimated that the contracting process is being delayed by a minimum of four additional months as a result of involvement by the Washington Office. There is a duplication of legal review, in that the WASO solicitor reviews all contracting actions even though the regional solicitor has also reviewed them. Delegation of authority is confused. Some regional directors believe they cannot sign or extend a contract, establish a franchise fee, or execute maintenance agreements or operating plans without WASO review and approval, while other regional directors have delegated some of these actions to the park level. The WASO concessions staff is not, in some instances, abiding by the authority already
delegated. In keeping with the recommendations made elsewhere with respect to the role and function of the Washington Office, the staff should abide by the authority already delegated.

The chief of concessions has announced plans to convene another task force to review and determine organizational, program, and funding needs and priorities for improvements to concession facilities.
Fourteen technical service centers and numerous cooperative park study units scattered across the United States currently provide professional expertise to the parks in areas such as road and building construction, interpretive media, preservation of archeological and historic resources, fire fighting, resource mapping, and protection of air and water quality.

These offices are

Air Quality Division, Denver, Colorado
Water Resources Division, Fort Collins, Colorado
Geographic Information Systems Division, Denver, Colorado
Mining and Minerals Branch, Denver, Colorado
Office of Operations Engineering, Denver, Colorado
Denver Service Center, Denver, Colorado
Harpers Ferry Center, Harpers Ferry, West Virginia
Western Archeological and Conservation Center, Tucson, Arizona
Southwest Cultural Resources Center, Santa Fe, New Mexico
Midwest Archeological Center, Lincoln, Nebraska
Southeast Archeological Center, Tallahassee, Florida
Southeast Cultural Resources Preservation Center, Atlanta, Georgia
North Atlantic Historic Preservation Center, Boston, Massachusetts
Fire Management Office, Boise Interagency Fire Center, Boise, Idaho

Cooperative park study units

Not included in this category are the special project offices that may be established from time to time to accomplish a specific task such as land acquisition, or the two training centers.
WASO FIELD OFFICES

General Alternatives

Four WASO field offices in Denver and one in nearby Fort Collins provide technical support to the parks in air and water management, geographic information systems, mining and minerals management, and operations engineering. These offices all seem to be outside the basic management structure for priority-setting and fund allocation. The task force identified the following alternatives for dealing with this general situation:

1. Retain the offices as currently organized.

2. Defer organizational changes pending an in-depth study of the science, research, and resource management programs of the Service.

3. Reorganize the offices into a new Division of Resource Services, which would include the Air Quality Division, the Water Resources Division, the Geographic Information Systems Division, the Branch of Mining and Minerals, the Office of Operations Engineering, and other resource offices reporting to the Denver Service Center.

The offices are analyzed individually below.
Air Quality Division

The Air Quality Division, established in 1977, is responsible for the preservation, protection, and enhancement of air quality and related values throughout the national park system by ensuring compliance with the Clean Air Act and the NPS Organic Act. The office has evolved from a small policy office into a comprehensive policy and technical-program division with expertise in air pollution modeling, monitoring, resource effects, control technology, and federal and state regulations. Also, the division has achieved national leadership in visibility research, monitoring, and development of visibility protection measures.

Current Status, Resources, and Organizational Requirements. In 1987 the division had a budget of $6,171,000, of which $1.3 million was for salaries and office support and $4.9 million was project funding. Staffing totaled 25 FTEs, including the staff headed by the division chief in the WASO field office in Lakewood, Colorado, and a small staff headed by the assistant division chief in Washington, D.C.

Under the Clean Air Act 48 units of the national park system are currently designated as class I air quality areas. This designation permits little deterioration of air quality and imposes strict protection of air quality related values. The remaining units of the national park system are class II areas, which are also protected. The Clean Air Act requires the Service to review permit applications for major new sources of air pollution and for major modifications to existing sources to
determine whether the proposed air emissions will have an adverse impact on the air quality related values of a class I area. Issuance of a permit may depend upon the Service's determination. The division has reviewed approximately 200 permit applications since 1978. This review has resulted in changes in many of the proposed projects, such as adoption of more efficient control technology, downsizing of the operation, selection of a new location, or commitment to monitoring and study of park resources.

The division's monitoring program measures and documents the visibility of park vistas and measures fine particulates, ozone, and sulfur dioxide in 48 class I parks and 13 class II areas with significant air pollution concerns. Given the importance of scenic resources to the park experience, the Service places a high value on attaining and preserving natural visibility in park areas. The division also monitors biological effects in 56 parks to determine air pollution effects on vegetation and to establish damage thresholds and margins of safety for avoiding adverse effects. The approximate annual costs of monitoring are $75,000 per site for gaseous pollutants, $10,000-$43,000 per site for fine particulates, $6,000 per site for meteorological data, $12,000-$49,000 per site for visibility, and $12,000 to $50,000 per site for biological effects.

Monitoring data are used by the National Park Service, the Environmental Protection Agency, the states, and private industry to analyze the impacts of proposed new developments on park areas and to develop long-range strategies for protecting the natural and cultural resources of park areas. The National Park Service also uses the information from the
air quality monitoring program in interpretive programs to further the public’s understanding of critical resource issues.

Other Alternatives. In addition to the general alternatives for all the WASO field offices, the following alternative was considered for the Air Quality Division:

1. Eliminate the central office and return personnel to the regional offices.

Water Resources Division

The division recommends policy and develops standards for servicewide water resource programs. It furnishes scientific and technical information derived from water-related research in such fields as ecology, geology, hydrology, water supply, water quality and treatment, and geothermal resources. It is responsible for the Service's involvement in the implementation of federal laws, executive orders, and regulations concerning climate, water, and land resources as they relate to water use, water requirements, water limitations, and water quality.

Current Status, Resources, and Organizational Requirements. In 1987 the division had a budget of $3,284,400 and was assigned 29 FTEs. Of the total budget, $1,580,300 was for salaries and $1,703,700 was project funding. The division is divided into four branches: Applied Research, Water Services, Water Rights, and Policy, Planning, and Evaluation.
The division's activities focus on the increasing array of legal and administrative requirements and water-related problems occurring throughout the national park system. These problems range from the health impacts of small septic systems leaking into drinking water supplies to the effects on park resources of large regional hydroelectric projects. They involve toxic discharges from mining and industrial operations, organic pollution from municipalities or malfunctioning sewage-treatment facilities, and withdrawals for domestic, municipal, and industrial uses, which reduce surface flows, lower groundwater tables, and in coastal areas, possibly produce saltwater intrusion.

Specific program components include

- water resource management planning, including the formulation and implementation of water quality management plans, location and development of groundwater sources to replace existing surface water supplies, and delineation of floodplains and related hazards

- securing and protecting NPS water rights, including quantification of federal reserved water rights and perfection of state appropriative water rights

- research and development of effective tools, techniques, and data to help park managers meet threats to aquatic or riparian ecosystems
technical assistance to help park managers solve water resource problems

The staff includes experts in hydrology, water quality, and water resources management. Studies requiring expertise beyond the scope of the staff are conducted under agreements with other federal agencies, principally the U.S. Geological Survey, or by contract with state agencies, universities, or private consultants.

The Applied Research Branch is too small for efficient management and administration as a separate organizational unit. It consists of a GS-14 chief, two GS-13 hydrologists, a GS-12 environmental specialist (working on acid rain), and a secretary. The 1987 budget for this branch was $427,800. An additional $181,000 in project funding was spent for research and studies conducted largely through Colorado State University.

The actual and projected workloads for 1986 through 1988 are shown in table 6.

Table 6: Water Resources Division Workload, FY 1986-88

<table>
<thead>
<tr>
<th>Program</th>
<th>1986 (actual)</th>
<th>1987 (estimate)</th>
<th>1988 (estimate)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water resource studies</td>
<td>13</td>
<td>9</td>
<td>7</td>
</tr>
<tr>
<td>Location of potable water sources</td>
<td>2</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Water resource management plans</td>
<td>2</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>Water monitoring programs</td>
<td>26</td>
<td>29</td>
<td>27</td>
</tr>
<tr>
<td>Flood hazard surveys</td>
<td>2</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Water rights adjudications</td>
<td>46</td>
<td>45</td>
<td>45</td>
</tr>
<tr>
<td>Totals</td>
<td>91</td>
<td>89</td>
<td>86</td>
</tr>
</tbody>
</table>
Other Alternatives. In addition to the general alternatives for all the WASO field offices, the following alternatives were considered for the Water Resources Division:

1. Eliminate the Applied Research Branch (a small five-man office); retain the remainder of the division.

2. Eliminate the central office and return personnel to the regional office.

3. Eliminate the function.

Geographic Information Systems Division

This division serves as the central office for policy development and technical support in remote sensing and geographic information systems. The division is responsible for providing technical assistance to parks, regions, and the Washington Office in the acquisition and analysis of remote sensing data and in the construction and operation of geographic information system data bases.

Background. The National Park Service began to develop an integrated remote sensing, digital cartography, and geographic information systems capability in the mid 1970s at the Denver Service Center. In 1984 a study group proposed by the 1983 Realignment Committee recommended
that the Service establish a base-funded technical field unit for those functions, upgrade the unit's computer capabilities, and establish a servicewide priority-setting process for developing the unit's project workload. These recommendations resulted in the establishment of this division in Denver in 1984.

Current Status, Resources, and Organizational Requirements. In 1987 the division was authorized an annual operating budget of $541,200 and 11 FTEs. Salaries and benefits totaled nearly $499,000, leaving only $42,000 for office support (travel, telephones, printing and reproduction, purchase and maintenance of equipment, and supplies). Thus, there was a significant shortfall in funding for office support activities.

The division reports to the associate director for natural resources in the Washington Office. Each year prioritized lists of GIS technical support needs are submitted by the regional offices. Based on these submissions an annual work plan is prepared.

The division is divided into two branches: Remote Sensing and Digital Cartography. The Remote Sensing Branch produces and analyzes thematic (usually vegetation and land use) maps using traditional aerial photointerpretation or computer-assisted classification of digital data from satellites or aircraft scanners. This branch also manages an ecological data base program, which maintains a computerized inventory of vascular plants throughout the park system.
The Digital Cartography Branch accepts maps from a variety of sources, including photointerpretation, and enters them into a computer as GIS databases for further analysis and display. The Park Service is using GIS technology as a scientific basis for decision making. Applications of the GIS databases include detection of ecological change, identification of potential wildlife habitat, identification of threats to parks, and fire-behavior modeling. The GIS databases range in size and complexity from the spatial distribution of coral communities in 2-meter by 30-meter areas at 200 locations at Biscayne National Park to more than 30 themes for the nearly 9 million acres within Wrangell-St. Elias National Park and Preserve.

The National Capital Region and the Alaska Region have ongoing programs with the GIS Division to construct GIS databases for all the parks in those regions. The National Capital Region requires that a GIS database be completed prior to revisions of a park's general management plan.

The cost of GIS database development makes it difficult for most parks to fund. The cost of contracting for scan-digitizing support is a major factor. Developing an in-house capability for scan-digitizing might make GIS database development more affordable.

Other Alternatives. In addition to the general alternatives for all the WASO field offices, the following alternatives were considered for the Geographic Information Systems Division:
1. Eliminate the function.

2. Increase the resources available for accomplishing the division's mission.

Office of Operations Engineering

The Office of Operations Engineering is responsible for recommending policy and for formulating procedures and guidelines to ensure field compliance with national, state, and local codes, regulations, and legislation applicable to park operations. The office provides direct support to all field areas.

Background. This office first operated as a maintenance assistance program in the Denver Service Center in the mid 1970s. At one time the office had an annual operating budget of $600,000 and 12.6 FTEs. In 1979 the unit was placed under the supervision of the Washington Office. The 1984 Realignment Committee changed the name of the office to the Office of Maintenance and Communications Engineering; the name was then again changed to the Office of Operations Engineering.

Current Status, Resources, and Organizational Requirements. In 1987 the office had an annual operating budget of $498,100 and 10 FTEs. This small office is divided into two branches: Consulting Engineering and Telecommunications (each branch has four employees). The office reports to the chief of engineering and safety services in the Washington Office.
The Consulting Engineering Branch ensures compliance with required codes and standards and solves technical problems related to the operation of park facilities. The Telecommunications Branch guides the acquisition and administration of radio, telephone, and data communications facilities used in the management of park areas. The office chief oversees servicewide utility engineering and negotiation of water, sewer, gas, and electric contracts.

The office provides staff assistance to the Service and the Department upon request and maintains liaison with government agencies and professional organizations having an interest in park operations and compliance with applicable codes. It provides all operations throughout the Service with professional staff advice and technical direction related to park structures, utility systems, roads, trails, bridges, dams, equipment management, energy conservation, and transportation systems. The office represents the Service before international organizations, the General Accounting Office, the National Bureau of Standards, private industry, professional organizations, and other government agencies in matters related to operations engineering.

Other Alternatives. In addition to the general alternatives for all the WASO field offices, the following alternatives were considered for the Office of Operations Engineering:
1. Eliminate the function.

2. Increase the capability of the office by adding levels of expertise.

3. Return the function to the Denver Service Center.

4. Return the office to Washington as a WASO policy office.

Mining and Minerals Branch

The Mining and Minerals Branch is responsible for formulating policy recommendations and regulations and for establishing procedures, methods, guidelines, and standards for the energy development and mining and minerals activities of the Service. The branch supervises and schedules NPS mining and mineral examination and appraises and reviews plans of operations under the Mining in the Parks Act and other laws and regulations affecting mineral exploration, development, and extraction in park units. The branch is also responsible for development of the Service's mineral ownership/claims data base and for NPS coordination with other bureaus and agencies on energy, mining, and mineral development matters affecting park resources. The branch provides technical assistance to park superintendents on energy development and mining and minerals activities affecting park resources.
Background. This office was formed in 1983 after a comprehensive analysis prepared by the NPS Office of Science and Technology concluded that the minerals management program of the Service was inadequate and that a central office was needed to address the issue. At that time it was perceived both within and outside the Service that there was a lack of high-level NPS concern for the management of mineral resources within NPS boundaries and for protecting NPS resources from external mineral development. Resources to form the office came from the Rocky Mountain Regional Office, the Denver Service Center, and the Washington Office.

Current Status, Resources, and Organizational Requirements. For 1987 the division was authorized an annual operating budget of $1,407,700 and 29 FTEs. The division reports to the chief of land resources in the Washington Office. The division is divided into three sections: Policy and Regulations, Environmental Assessment, and Mineral Resources. The largest, Mineral Resources, has a staff of 12 people.

Outside Alaska (which has developed its own energy, mining, and minerals capability) approximately 30 NPS units have internal mineral development activity and 150 units have external activity near their boundaries that is either adversely affecting park resources and the visitor experience now or could potentially do so in the future. An additional 70 park units could be adversely affected by mineral development in the near future.
There has been a history of litigation against the Service on mining issues. The Service was taken to court in three major lawsuits involving mineral issues at Glen Canyon, Lake Mead, and Alaska. These suits generally involve the perception that the Service has not adequately protected its resources from mineral activity.

A 1985 study by Temple, Barker and Sloane, Inc., concluded that (1) the potential for mineral development in the parks is sufficiently high to warrant NPS concern and attention, (2) a lack of regulatory controls over certain types of mineral development activity in the parks may limit the Service's ability to protect park resources, and (3) the Service has insufficient information about mineral ownership and activity. The report recommended ways the Service could improve its knowledge of mineral ownership and development activities and respond more quickly to minerals issues by taking such steps as developing an adequate data base, gathering information about mineral development activities underway, improving records, cooperating with other agencies, setting priorities, developing the capability to perform title searches, and examining existing regulatory controls. These recommendations are being acted upon.

Other Alternatives. In addition to the general alternatives for all the WASO field offices, the following alternatives were considered for the Mining and Minerals Branch:
1. Eliminate the central office and place the personnel in the regional offices.

2. Eliminate the function.

DENVER SERVICE CENTER

The Denver Service Center is the principal office established to execute the major planning, design, and construction/cultural preservation program of the National Park Service. The center also houses several specialized services. Its staff develops and implements new techniques, such as life-cycle costing and value engineering, for use throughout the system. The Statistical Unit provides information to support planning decisions. A sophisticated graphics operation provides a wide range of services to requesters, including land mapping, graphic design, and information storage and retrieval in its Technical Information Center. DSC employees often represent the National Park Service in its relations with other federal agencies, universities, and international organizations and governments.

Background

Professional staffs to assist managers in park design and construction work have existed since the early days of the National Park Service.
Originally they worked out of the parks, and when the first regional offices were established in 1937, they transferred to the regions.

In 1954 central design and construction offices were set up in San Francisco and Philadelphia as a part of a general reorganization of the Service to handle the upcoming Mission 66 construction program. The architects, engineers, landscape architects, and other professionals assigned to these offices were responsible for the major road, building, and utility design and construction projects. Program amounts reached $80 million to $90 million annually.

Master planning remained a field responsibility through the 1950s. Plans were initiated by the parks and reviewed and approved by the regions and the Washington Office. Designs were analyzed by the design and construction offices. In 1961, when an updating of park master plans was needed to support the extensive Mission 66 construction program, the master plan function was transferred to the regional offices.

In 1965 planning, design, construction, and several other activities were consolidated into two service centers, a western center in San Francisco and an eastern center in Philadelphia (relocated to Washington, D.C., in 1969). The service center concept was threefold: (1) provide continuity of workflow from the new area study, through the master plan, through the design, to construction; (2) achieve better utilization of professional manpower and funds by facilitating shifts in personnel to reflect shifts in national program emphasis; and (3) create some separation between park
and regional managers and professionals. Small professional staffs were retained in the regions to assist the regional directors and park superintendents in day-to-day park operations and maintenance.

In 1971 a required cutback in NPS personnel was largely met by combining the western and eastern service centers into one Denver Service Center. The two centers had contained 583 permanent positions. Of those, 292 were moved to the Denver Service Center and 291 were moved to regional offices, field areas, or other government agencies, or vacated through severance or retirement. The original authorized ceiling for the Denver Service Center was 351 permanent positions.

**Current Status, Resources, and Organizational Requirements**

In 1987 the Denver Service Center was authorized an operating budget of $44.1 million and 540 FTEs. Funding for the center, which has varied from $25.6 million to $52.8 million between 1980 and 1987, is generally derived from planning, design, cultural resource preservation, and construction project monies (see table 7). Most other offices in the National Park Service are base-funded as organizational units, but 98 percent of the Service Center's funds come directly or indirectly from specific project accounts. Only the statistics and concessions management sections are base funded.
Part of the total operating budget and FTEs of the Denver Service Center are assigned to the Williamsport Preservation Training Center, which is a field office of the Denver center. In 1987 the Williamsport center was authorized an operating budget of $1.8 million and 17 FTEs. The Williamsport center is analyzed separately.

Table 7: Funding Sources, Denver Service Center, FY 1987 ($ millions)

<table>
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<tr>
<th>Funding Source</th>
<th>Carryover to FY 87</th>
<th>New Money</th>
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<td>Previous year carryover</td>
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<td>General management plans</td>
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<td>Advance planning</td>
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<tr>
<td>Project planning</td>
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<td>8.8</td>
</tr>
<tr>
<td>Construction supervision</td>
<td></td>
<td>5.1</td>
</tr>
<tr>
<td>Refundables and reimbursables</td>
<td></td>
<td>1.8</td>
</tr>
<tr>
<td>Federal land highway program</td>
<td></td>
<td>4.8</td>
</tr>
<tr>
<td>Other</td>
<td></td>
<td>8.4</td>
</tr>
<tr>
<td>Total funding</td>
<td>$9.5</td>
<td>$34.6</td>
</tr>
</tbody>
</table>

A 1983 survey showed that the Denver Service Center employed 50 percent of the engineers, landscape architects, and architects in the National Park Service. Thirty percent were stationed in the regions and the Washington Office, and 20 percent in the parks. (Table 8 lists the 1987 professional/technical staffing of the center.)

Because the staffing at the Denver Service Center cannot expand or contract as quickly as the planning, design, and construction program, the center maintains a level of staffing well below the theoretical maximum, and it contracts the difference to private architectural and
engineering (A/E) firms. Virtually all the construction program is done by contract, and much of the professional services program is done through private A/E firms. Over the past five years, these activities have accounted for 76.5 percent of all funds managed by the Denver Service Center.

Table 8: Professional/Technical Staffing, Denver Service Center, September 1986

<table>
<thead>
<tr>
<th>Position</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Landscape architect</td>
<td>76</td>
</tr>
<tr>
<td>Architect</td>
<td>70</td>
</tr>
<tr>
<td>Civil engineer</td>
<td>55</td>
</tr>
<tr>
<td>General engineer</td>
<td>24</td>
</tr>
<tr>
<td>Electrical engineer</td>
<td>11</td>
</tr>
<tr>
<td>Mechanical engineer</td>
<td>6</td>
</tr>
<tr>
<td>Environmental engineer</td>
<td>5</td>
</tr>
<tr>
<td>Safety engineer</td>
<td>1</td>
</tr>
<tr>
<td>Engineering and architecture student trainee</td>
<td>13</td>
</tr>
<tr>
<td>Engineering technician/drafting</td>
<td>36</td>
</tr>
<tr>
<td>Construction representative</td>
<td>8</td>
</tr>
<tr>
<td>Planner</td>
<td>26</td>
</tr>
<tr>
<td>Historian</td>
<td>12</td>
</tr>
<tr>
<td>Natural scientist</td>
<td>28</td>
</tr>
<tr>
<td>Social scientist</td>
<td>6</td>
</tr>
<tr>
<td>Archeologist</td>
<td>10</td>
</tr>
<tr>
<td>Surveyor/surveying technician</td>
<td>18</td>
</tr>
<tr>
<td>Contracting/procurement officer/clerks</td>
<td>16</td>
</tr>
<tr>
<td>Technical graphics specialist</td>
<td>13</td>
</tr>
<tr>
<td>Graphic artist</td>
<td>13</td>
</tr>
<tr>
<td>Writer-editor</td>
<td>14</td>
</tr>
<tr>
<td>Exhibit specialist</td>
<td>10</td>
</tr>
<tr>
<td>Concessions specialist</td>
<td>5</td>
</tr>
<tr>
<td>Restoration craftsman/laborer</td>
<td>16</td>
</tr>
<tr>
<td>Administrative officer/clerk</td>
<td>77</td>
</tr>
</tbody>
</table>

Total 569

The Denver Service Center has been the subject of 15 major external audits or internal status reports over the past eight years. In addition,
the center complied with OMB Circular A-76 by reviewing the three in-house activities required by the circular. The following summarizes the major findings and actions of these studies.

The three in-house activities reviewed in compliance with OMB Circular A-76 were the Branch of Micrographics, the NPS aircraft, and architectural and civil engineering services. A management study of the Branch of Micrographics was conducted during 1983. The assistant secretary for fish, wildlife, and parks reviewed the study and certified that the in-house cost estimate was based on the most efficient organization. The comparative costs of contracting services were identified through formal advertising and bidding. The in-house bid resulted in cost savings to the government of $802,286 over a three-year period. This process, which was completed in June 1984, complied with all steps of the A-76 process, including formal advertising.

An in-house A-76 management review of the Denver-based NPS aircraft service resulted in the activity being terminated and the service provided by the Department's Office of Aircraft Services. This saved $198,000 per year and two FTEs.

A major management study of the DSC architectural and civil engineering services was conducted during 1984. The recommendations for the most efficient organization were approved by the assistant secretary for fish, wildlife, and parks in January 1985. Major actions were
Reorganize the DSC four-team alignment into a new three-team alignment (This was completed in October 85.)

Purchase and implement a computer-aided design/drafting (CADD) system (Benchmarking of formal bid proposals is underway, March 1987.)

Locate all DSC teams within the same building (A move to one building is scheduled by GSA for July 1987.)

Limit design changes after preliminary plans are approved (This problem requires servicewide action and now has the support of the director and deputy director.)

The DSC awards from $50 million to $93 million in construction contracts and from $3 million to $16 million in negotiated A/E contracts per year. Audits of this contracting function have shown overall compliance with all federal acquisition regulations. Actions to improve the DSC acquisition process and better document files for audit tracking have included filing a copy of individual contract plans in the contract file, making sure that contracting personnel are professionally negotiating contracts and modifications, ensuring that the contracting officers are making independent acquisition decisions within their authority, and monitoring compliance with regulations concerning brand name or equal references in specifications.
Congressional staff reports and audits by the comptroller general, the inspector general, the Office of Personnel Management, and NPS Washington Office task forces have made numerous recommendations, all of which have been implemented. Some of the actions taken as a result of these audits are listed below:

A project management system has been implemented.

Construction cost estimates are now updated in the fall for the budget year program.

Detailed professional-services cost estimates are prepared for each project, instead of programming a percentage of construction costs.

Potential SBA projects are identified six to seven months before the annual construction funds are appropriated.

The DSC Manager's Office plays an active role in managing the minority business enterprise program.

The center's workload capability is determined annually in the workload analysis estimating process.

Scheduling and prioritizing of project work is done on a centerwide basis, not independently on each team. One assistant manager is now responsible for each of the three major professional activities.
The role of each DSC office in getting design jobs out has been clarified in the Design Process Manual.

Detailed information is included on overtime approval forms.

Scheduling and obligation of the construction program has been improved with the servicewide priority system and DSC scheduling recommendations.

Contingency funds (force account) are no longer included in construction contracts.

Construction program formulation and DSC management have been improved by updating and enforcing policies, establishing a servicewide priority system, and implementing an internal project management system.

The original five-team structure has been reduced to three teams, the New York Office has been reduced, the Branch of Engineering Systems has been abolished, the Digital Cartography and Remote Sensing units have been reassigned, one survey crew has been abolished, and cultural resource branches have been abolished on three teams.

The number of GS-11 through GS-15 positions have been reduced as a portion of all permanent positions, less use is made of part-time
and subject-to-furlough positions to do full-time work, and the resources devoted to the Federal Employment Opportunity Recruitment Program have been increased.

WILLIAMSPORT PRESERVATION TRAINING CENTER

The Williamsport Preservation Training Center, a field office of the Denver Service Center, has been in operation since 1977. The center has been very successful in training personnel in historic preservation. The center concentrates its efforts in four major areas:

training architects, engineers, and other professionals in historic preservation

training exhibit specialists, who supervise project accomplishment through day labor

training maintenance managers in the maintenance of historic resources

training master craftsmen (carpenters, masons, painters, etc.)
Current Status, Resources and Organizational Requirements

In 1987 the center was authorized an operating budget of $1.8 million and 17 FTEs. The center also employs a temporary staff of between 15 and 20 people, depending on funding and projects. Eighty percent of the budget is project funded, with overhead of approximately $160,000 provided by the Denver Service Center. The center needs a steady supply of base funding so that logical programming can occur and an adequate number of trainees can be selected in advance.

The center's manager has total authority for selecting projects and establishing priorities. Projects are normally selected from the DSC development program. The center is available for consulting work on a reimbursable basis. The Mid-Atlantic Region has used the center extensively. About 5 percent of the center's projects have come from outside the Service, including the Department of Defense.

It appears that the center is providing a unique and necessary service. However, there is some question about whether the center should remain part of the Denver Service Center. The current facility does not meet OSHA standards and must be replaced.
Alternatives

1. Make the center part of the Harpers Ferry Center.

2. Place the function in the Washington Office.

3. Make the center a field office of the North Atlantic Historic Preservation Center.

4. Make the center part of Harpers Ferry National Historical Park.

5. Make the center part of the Mather Training Center.

HARPERS FERRY CENTER

The Harpers Ferry Center, established in 1970, is the interpretive design center for the National Park Service. It prepares interpretive prospectuses to guide interpretive services, and it develops and evaluates new interpretive techniques and technology. The center plans and produces museum and wayside exhibits, audiovisual presentations, and interpretive publications. The center also plans for, acquires, and installs historic furnishings and performs preservation work on furnishings and exhibit artifacts. The center also provides servicewide assistance to parks in library and archival activities.
Current Status, Resources, and Organizational Requirements

In 1987 the center was authorized an annual operating budget of $10.1 million and 138 FTEs. An additional $7.7 million in project funding increased the total funding to $17.8 million (see table 9). The manager reports directly to the assistant director for interpretation in the Washington Office.

Table 9: Funding and FTEs, Harpers Ferry Center, FY 1987

<table>
<thead>
<tr>
<th>Division</th>
<th>FTEs</th>
<th>Funding</th>
</tr>
</thead>
<tbody>
<tr>
<td>Audiovisual arts</td>
<td>38</td>
<td>$1,096,000</td>
</tr>
<tr>
<td>Exhibit rehabilitation and preservation</td>
<td>98</td>
<td>3,962,000</td>
</tr>
<tr>
<td>Informational publications</td>
<td>23</td>
<td>3,400,000</td>
</tr>
<tr>
<td>Museum exhibit maintenance</td>
<td>10</td>
<td>457,000</td>
</tr>
<tr>
<td>Museum reference services</td>
<td>19</td>
<td>1,176,000</td>
</tr>
<tr>
<td>Training support</td>
<td>--</td>
<td>21,000</td>
</tr>
</tbody>
</table>

Subtotal, project funding: 138 FTEs, $10,112,000

Total: 138 FTEs, $17,833,000

The center has nine principal divisions: Interpretive Planning, Exhibit Planning and Design, Museum Production, Wayside Exhibits, Audiovisual Arts, Historic Furnishings, Conservation Labs, Publications, and Administration. There are also six offices that report directly to the center manager: Program Formulation and Analysis, Library and Archives, Graphics Research, Equal Opportunity, Special Projects and Museum Rehabilitation, and the Statue of Liberty Office.
The center is involved in the following inventory of interpretive facilities:

- 425+ manned visitor centers and visitor contact stations housing exhibits and audiovisual programs
- 170 motion picture theaters
- Several hundred unmanned exhibit shelters
- 200+ historic structures, some of which have been furnished
- 500,000 historic artifacts either on exhibit or intended for exhibit
- 6,600 wayside exhibits at roadside pullouts, trailheads, overlooks, etc.

On the average, a media presentation should be updated or replaced every 15 years. The center's current production capacity is about 10 major rehabilitation projects a year (three or four major visitor centers and six or seven smaller projects), which equates to a 42-year cycle. (A recent survey of all regional offices indicates that 60 percent of the interpretive devices in staffed buildings need major rehabilitation. This equates to a current backlog of 260 projects.) The center can produce about five motion pictures a year, which equates to a 34-year cycle; it can plan for and complete the acquisition of furnishings for six historic
structures per year, and replace approximately 325 wayside exhibits each year, which equates to a 20-year cycle.

This capacity statement assumes that the total productive capacity of the center is directed toward upgrading or replacing existing media facilities. The reality is that each congressional add-on, such as the new proposed American Industrial Heritage project with funding of $18 million each year for the next five years, and the regular advance planning, project planning, line-item construction, and other new projects initiated by WASO, the regions, and the parks divert resources away from projects in the major rehab program and further increase the cycle time and backlog. Line-item work has always taken priority over major rehabilitation projects. Harpers Ferry Center line-item funds are normally associated with large building construction funds. In order for the Denver Service Center to obligate building funds, Harpers Ferry Center must assign staff to new construction work concurrent with the Denver Service Center. When that happens, the same personnel who are doing the rehabilitation work become involved with higher-priority construction, and rehabilitation is diverted to a lower priority.

Funding for the major rehab program has actually declined 22 percent since 1980 (from $5,100,000 to $3,962,000). This decline in funding has taken place at the same time that staff salaries, transportation costs, and contract costs (materials and labor rates) have increased. The Consumer Price Index increased 42.8 percent from January 1980 to January 1987. Consequently, just to maintain the 1980 funding level would require a
A major rehabilitation program of $7,282,000 in 1987. The current funding is only 54 percent of that amount.

The center's multiyear program currently contains projects totaling $68 million, including both rehabilitation and new construction projects. Because of the center's inability to accomplish all the projects the parks want, an increasing number of parks are doing "homemade projects" rather than accepting the long wait before Harpers Ferry Center can program and schedule their work. This sometimes results in substandard exhibits.

The center's management intent, in spite of the current limited funding base and FTEs (which declined from 225 in FY 1980 to 188 in FY 1987) is to increase production by 10 percent each year for the next three years. The bright light for FY 1987 and FY 1988 is that parks, regions, cooperating associations, and others appear to have discretionary funds that they are now bringing to the center. This means funds are available for work if the center can schedule and accomplish it on some kind of a rational priority basis beginning in FY 1988.

A number of actions are underway to help speed up the process:

The center has moved toward contracting for all types of work, particularly design and production, including audiovisual production. A system has been established to encourage parks to use the center's contractors. This approach still requires staff time and
contracting expertise to select the contractors, set up the basic contracts, and assist the parks. The reality is that many times, once the job is at the contractor's, Harpers Ferry Center is asked by the parks to review progress, advise on problems, participate with the park in decisions relating to the contract, and review the final products, all of which require staff time.

High-speed ADP equipment is being used for administration of the program, personnel, construction, and word processing.

The use of high-speed ADP equipment for exhibit design, publications, and audiovisual production is being explored.

Communication and coordination with the regional offices and the Denver Service Center is being increased through workshops and staff assignments.

All phases of the center's operations are being intensively reviewed and revised. Specific changes to date include project status reporting and program review meetings.

The center is attempting to develop a systemwide priority-setting process for a multiyear program. If this effort is successful, the regions and WASO will be able to establish priorities for the major rehabilitation program, which will then be sequenced with the existing multiyear systemwide construction program and scheduled by the HFC technical staff.
The dual mission of the Western Archeological and Conservation Center is (1) to provide professional archeological services to units of the national park system in the Western Region, and (2) to manage a museum collections repository that provides a full range of professional collections management services for materials and artifacts stored at the center.

Background

Shortly after the Service was established in 1916 a management unit called Southwest National Monuments was organized to supervise the small monuments in the southwestern part of the United States. The unit was located in Globe, Arizona, after 1948. In 1957 the management and administrative functions for the southwest monuments were transferred to the Southwest Regional Office in Santa Fe. The general archeological and ruins stabilization work remained in the Globe office, which was renamed the Southwest Archeological Center and operated as a detached unit of the Southwest Archeological Office.

In 1965 the Southwest Archeological Center was placed under the supervision of the Washington Division of Archeological Studies and became one of two field research facilities (along with the Southeast Archeological Center). In 1971-72 the center moved to Tucson, where it could work closely with the University of Arizona, which has a particularly strong archeology program.
The 1972 reorganization of regional boundaries placed the center in the Western Region, and in 1975 the name was changed to the Western Archeological Center. The center was subsequently renamed the Western Archeological and Conservation Center to acknowledge the importance of the museum collections repository.

Current Status, Resources, and Organizational Requirements

In 1987 the center was authorized an annual operating budget of $879,900 and 31 FTEs. Additional project funding totaled $308,000. The center reports to the associate regional director for resource management and planning in the Western Region. The center operates through two professional units (the Museum Collections Repository and the Division of Archeology) and an administrative division. Of the center's entire 1987 budget of $1.2 million, slightly more than 54 percent went to the Museum Collections Repository.

The Administrative Division consists of a staff of five: an administrative officer, a personnel specialist, a budget specialist, and two clerks. In addition to serving the center, it also provides administrative support for the University of Arizona Cooperative Park Studies Unit and for an interpretive media specialist assigned to the Southern Arizona Group.

The Museum Collections Repository serves as a multiregional collections repository for more than a million artifacts owned by more than 41 parks
and monuments in the Western, Southwest, and Rocky Mountain regions. The repository provides the specific care required for the preservation and protection of the items, along with conservation treatment if indicated. A computerized inventory allows ready access to information about the artifacts stored there. The repository includes a research library with a document and photograph archive that is an unequaled reference source for more than 60 years of archeological research in the Southwest.

Through an interagency agreement with the Bureau of Reclamation, the repository is responsible for the management of collections recovered as a result of archeological work performed for the Central Arizona Project. The Bureau will reimburse the National Park Service for all costs and will design and construct a new facility if needed. This program is supported by a cooperative agreement with the Arizona State Museum, which is helping staff the repository. A recent Department of the Interior study recommends that the repository be considered as a regional interdepartmental storage facility.

The Division of Archeology assists park managers in building a computerized inventory of archeological resources, conducting surveys and excavations, reviewing the impacts of construction, and resource interpretation. On-site assistance in ruins maintenance is scheduled cyclically or as requested. The division directly serves 17 parks in Arizona and adjacent desert areas; other, larger parks in the region have their own archeological resource management capabilities. To date, the
records for 2,700 archeological sites in seven Western Region parks have been computerized for use in planning and compliance.

Some of the elements of the center's organizational structure were recently implemented to carry out the recommendations of the 1983 Realignment Committee. Their recommendations included establishing the collections management function as the primary mission of the center, and issuing a WASO special directive defining policy and procedures for the center to provide collections management assistance to parks throughout the arid western United States. WASO Special Directive 85-4 was issued in November 1986, and an operations evaluation of the repository is underway and scheduled for completion in early FY 1989.

The 1983 Realignment Committee also recommended the abolishment of the Structures Conservation Division, which existed prior to 1985, and the consolidation of the remaining activities of the center into a single division. In compliance with this recommendation, most of the functions of the Structures Conservation Division, including structural engineering, soils testing, and materials evaluation, were abolished in 1985. These functions are now purchased under contract whenever needed. The ruins stabilization function was relocated to the Division of Archeology on a temporary basis pending establishment of a Western Preservation Center at Golden Gate National Recreation Area. This center was originally envisioned as a sort of "Williamsport West," where western construction materials and ship preservation could be emphasized. A 10-237 is on file for the Golden Gate center, but it is highly unlikely that funding will be
available any time in the near future. Hence, the ruins stabilization function remains "temporarily" with the Western Archeological and Conservation Center.

One recommendation of the 1984 Realignment Committee was judged to be infeasible. That was the recommendation that the center's administrative services be consolidated with the Southern Arizona Group Office or the Western Regional Office. A careful analysis of the steps needed to carry out this recommendation indicated that on-site administrative staff (albeit lower graded) would still be necessary, the administrative services currently rendered to the University of Arizona Cooperative Park Studies Unit would be disrupted, the Southern Arizona Group Office would have to relocate to a larger space to accommodate increased administrative staff, and internal controls might suffer from the distance between administrative officers and administrative technicians. For these reasons the recommendation was dropped.

The center is housed in a 41,000-square-foot building designed for its needs in 1979. The building is privately owned and leased to GSA under a 10-year lease that expires in 1988. Annual rent is $333,701. Half the building, or slightly more than 21,000 square feet, is designed for artifact storage. The building contains laboratories, including one large enough to simultaneously spread out the artifacts of two or three survey projects for analysis.
The center has four natural history collections on loan: The faunal
collection (one of the best of its kind in the nation) and the botanical
collection are at the Arizona State Museum, the paleontological collection is
at the University of Arizona Department of Geoscience, and the
osteological collection is on loan to the Arizona State University
Department of Anthropology.

Alternatives

1. Retain the center as currently organized.

2. Return to a completely centralized organization, moving archeologists
currently assigned to larger parks to the Western Archeology and
Conservation Center.

3. Eliminate the function.

4. Designate the center as a conservation center (museum collections
repository) only. Move the archeological functions to the Southwest
Region. The merits of this alternative would depend on a decision
to realign regional boundaries.
The Southwest Cultural Resources Center supervises all cultural resource management activities in the Southwest Region to ensure their professional quality. Archeological, anthropological, and historic resource studies are planned, coordinated, and evaluated through the center to support various park needs. The center's staff advises the Southwest Regional Directorate and park superintendents on cultural resource matters and operates a regional program that ensures compliance with all related legislative requirements, policies and regulations, as well as ensuring professional standards. The center has developed an expertise in remote sensing and submerged cultural resources, and it provides technical assistance in these fields to parks throughout the system.

Background

Mesa Verde National Park and Chaco Canyon National Monument had sufficiently large programs to justify on-site archeological centers of their own independent of the Southwest Archeological Center. Chaco Canyon National Monument was established in 1907 but a fairly large portion of the land base remained in the ownership of the University of New Mexico, the Museum of New Mexico, and the School of American Research. Legislation enacted in 1931 authorized an exchange of lands that enabled the grantors to continue scientific research. Chaco Canyon was of special research interest to the University of New Mexico, and its archeological
field school was once located there. In fact, there was so much going on at Chaco Canyon that the National Park Service entered into an agreement with the University of New Mexico in 1969 to establish the Chaco Center on the campus and to supervise a 15-year program of archeological research at the monument.

With the regional realignment of 1972 the Southwest Archeological Center was transferred to the Western Region. To fill the void the Chaco Center became the focus for archeological expertise and technology in the Southwest Region. In 1976 the center was merged with the Division of Cultural Resources in the Southwest Regional Office to form the Southwest Cultural Resources Center, reporting to the associate regional director for planning and cultural resources. The center remained at the University of New Mexico until 1986 when it moved to Santa Fe. One permanent full-time employee remains at the university to work with the Chaco Collection.

Current Status, Resources, and Organizational Requirements

The Southwest Cultural Resources Center is the largest multidisciplinary cultural resource unit in the National Park Service. It is organized differently from the others in that it is located within the regional office. Its staff interacts with the staffs of the other operating divisions on a daily basis and has regular contact with the Regional Directorate, both of which facilitate support to the parks. Administrative services needed by the center are provided by the regional office.
In FY 1987 the center was authorized an annual operating program of $865,800 and 48 FTEs. Project funding totaled an additional $2,676,000. Currently the staff consists of 44 permanent and 10 temporary employees. The two project funding sources for cultural resources management are the cultural resources preservation fund and the cyclic maintenance project fund.

The center is divided into four divisions: Anthropology, Conservation, History, and the Submerged Cultural Resources Unit. The Division of Anthropology contains two branches. The Branch of Cultural Research acts as a clearinghouse for anthropological data needed by the parks. The branch has developed an expertise in the application of remote sensing. The Branch of Cultural Resources Management assists parks in the management of archeological and ethnographic resources and plans, and implements studies in advance of other NPS activities to ensure resource protection and legal compliance.

The Division of Conservation is responsible for the actual physical preservation and conservation of cultural resources (including ruins stabilization). The division staff researches the causes of deterioration, plans preservation and treatment activities, supervises major resource preservation projects conducted by day labor or by contract, and trains personnel in preservation methods.

The Division of History advises on matters of cultural resource significance and management and assists the field areas in the evaluation
of cultural resources, identification of management alternatives, and compliance. The division prepares various studies such as historic structure reports, historic base maps, oral-history collections, and the like.

The Submerged Cultural Resources Unit conducts management-oriented studies of submerged cultural resources in the national park system on a servicewide basis and assists in implementing management actions resulting from these investigations. It does this through inventory and assessment of underwater archeological resources, assistance to parks with specific underwater problems, and assistance to park managers in developing cultural resource management plans and visitor use and protection plans in areas with submerged resources. It also coordinates between the Service and other agencies on submerged resource management questions and provides assistance servicewide on specific diving problems, including body recoveries, underwater maintenance problems, and development of diving guidelines and manuals. The Submerged Cultural Resources Unit was located in the Southwest Region precisely because the region lacks a heavy internal demand for their skills. Thus their loyalty is servicewide rather than project-specific. The center also provides an ideal pool of professional skills from which to draw.

The divisions of Conservation, History, and Anthropology carry out the bulk of the Southwest Region's cultural resource program, with the exception of collections curation and preservation. These divisions not only assure proper compliance and provide oversight and supervision for
cultural resource projects throughout the region, but, more importantly, establish priorities for the regional cultural resource preservation program. The chiefs of these divisions serve as regional historian, regional archeologist, and regional historic architect, respectively.

Survey and clearance collections on hand in the Southwest Regional Office are receiving curatorial care at a cost of $25,000 and 1.6 FTEs. The center's estimates of costs for inventory, assessment, and search for parties interested in collection research average $10,000 per park or $210,000 total. Cyclic maintenance (301) money is the expressed funding source for inventory, and the cultural resources preservation fund (302) is the source identified for assessment and search measures. It is obvious that 1.6 FTEs are insufficient to accomplish these tasks, and it is unlikely that most small parks are staffed to complete these functions themselves.

Collection storage in the regional office is not in keeping with NPS Special Directive 85-4, which established the Western Archeological and Conservation Center as the multiregional museum collections management and conservation repository for the Western, Southwest, and Rocky Mountain regions. However, while most park collections can potentially be transferred to the Western Archeological and Conservation Center, moving the Chaco Collection out of the state would not be politically acceptable. Based on the previous ownership of lands within the park by the University of Mexico and other considerations, the university alleges ownership of the collection, although the ownership question has not been
decided legally. Current costs to the National Park Service for the care of these materials is $34,000 and 1.8 FTEs.

The workload of the Southwest Cultural Resources Center appears to be very large if regional resource statistics are any measure. The Southwest Region has 36 park areas containing various kinds of cultural resources, and 22 parks are identified as cultural resource areas.

The region contains almost 9,000 identified sites, over 1,300 structures, and 2.7 million objects. Nearly 80 percent of the region needs archeological survey, and based on predictive modeling, there may be as many as 24,000 unidentified sites. Only 27 percent of the region's archeological resources have been inventoried. Although it is estimated that an update of the List of Classified Structures will bring the total number of structures in the region to 1,550, it has long been questioned just how many of these sites really need preservation maintenance in view of their rapidly deteriorating condition and the highly unlikely possibility of freezing them in time.

It is apparent that many cultural resource projects have been dormant owing to the lack of funding, and with the development of new programming and budget guidelines that will merge funding for natural and cultural resources, funding constraints may greatly affect the Southwest Cultural Resources Center's activities, and those of other centers as well.
Few parks request increases in base funding for cultural resources during budget calls. Regardless of the recommendations concerning the alignment of center functions, superintendents servicewide should be appraised of needs, means, and justifications for additional program increase requests and for additional development and study proposal packages that will support park missions in cultural resources management. Periodic reviews of park resource management plans, project statements, and supporting 10-238s will be essential to the continuation of strong cultural resource preservation efforts.

Alternatives

The health of the Southwest Cultural Resources Center is not totally contingent upon the development of more projects nor upon the growth of funding and staffing. However, the center's current five-year plan is predicated on those very factors, with no regard for other alternatives. Current projections by the center call for 40.8 additional FTEs in various disciplines regionwide, increases in funding in excess of $14,600,000 for new construction (detection and suppression systems, curatorial storage), and funding increases in excess of $5,470,000 in annual object conservation and cultural cyclic maintenance alone. Still other costs have not been projected.

Potential regional boundary realignments suggested elsewhere in this report would further impact the workload and associated staffing and
funding figures. However, these realignments would also create the potential to implement other alternatives, such as moving some curatorial functions from the Southwest Cultural Resource Center to the Western Archeological and Conservation Center, moving some archeological functions the other direction, combining some functions of the two centers, drastically increasing contracting under normal procurement procedures or under the provisions of OMB Circular A-76, and increasing use of cooperative park study units. The professional activities of the center must follow management initiatives and not intellectual preferences.

Close geographic proximity to the Southwest Regional Office is administratively efficient and requires less effort for management to be actively involved in program formulation, review, and evaluation. Relying on the regional office for administrative support, including contracting, and having regional management oversee program formulation and execution, requires fewer fiscal resources, and at the same time permits the center to be more efficient and eliminate backlogged work.

MIDWEST ARCHEOLOGICAL CENTER

The primary mission of the Midwest Archeological Center is to provide professional assistance to the parks and regional offices of the Midwest and Rocky Mountain regions in the management of archeological resources on park land.
Background

The Midwest Archeological Center evolved from the earlier Smithsonian Institution River Basin Surveys Office in Lincoln, Nebraska, created in 1946 to serve an archeological salvage program. The office was transferred to the National Park Service in 1969. Until 1974 the center's mission related primarily to the Interagency Archeological Salvage Program, and center personnel did little work in parks. In that year the interagency program was shifted to the newly established Interagency Archeological Services offices in Denver and Atlanta, and the Midwest Archeological Center reorganized with its first ONPS budget and staff to provide in-park archeological services to the Midwest and Rocky Mountain regions.

Current Status, Resources, and Organizational Requirements

In 1987 the center was authorized an annual operating budget of $281,600 and 27 FTEs. Additional project funds totaled $2,072,600. (Project funds have averaged $1,293,000 over the past six years.)

Approximately 60 percent of the center's program is in the Rocky Mountain Region and 40 percent in the Midwest Region.

The center is under the direction of a supervisory archeologist who reports to the regional director, Midwest Region. The center is divided
into five divisions: Developmental Archeology, Ethnohistory, Research Management (two divisions, one for each region), and one administrative division.

The Division of Administration, Contracting, and Support Services employs a staff of five: an administrative officer, one purchasing agent, an administrative clerk, and two clerk typists.

The Developmental Archeology Division specializes in the application of geophysical exploration technology to archeology, allowing subsurface features no longer visible on the surface to be located without prior excavation. The division also does developmental research into methods of preserving rock art. The division provides oversight for museum and curation needs. And it provides technical assistance in ADP applications/software and scientific illustration and photography. The library and records management are part of this division.

The Ethnohistory Division (consisting of one archeologist/ethnohistorian) provides ethnohistorical documentation and data for both the Midwest and Rocky Mountain regions.

Two parallel research management divisions (one serving the Rocky Mountain Region and one the Midwest Region) review draft planning and management documents submitted by the regions and the Denver Service Center, recommend archeological investigations, provide cost estimates, and draft 10-238s for programming the necessary work. The divisions
also design, conduct or contract, and report on investigations needed to identify archeological resources or to mitigate the impacts of development projects on archeological resources. These divisions also maintain an information base on the archeological resources of each park and update the parks' archeological base maps. Organizationally, these divisions are responsible for all field archeological work in the two regions. On occasion, however, regions have retained project work.

Like all the archeological centers, the Midwest center has a long-term cooperative agreement with a nearby university, in this case the University of Nebraska at Lincoln.

The center occupies 22,000 square feet in the Federal Building in Lincoln, Nebraska. The annual GSA rental cost is $184,524.

Alternatives

1. Retain the center at its present location.
2. Move the center to Denver, Colorado.
3. Divide the resources and personnel of the center between the Midwest and Rocky Mountain regions so each has its own capability.
4. Eliminate the function.
SOUTHEAST ARCHEOLOGICAL CENTER

The mission of the Southeast Archeological Center is to facilitate the long-term protection of archeological resources in the parks of the Southeast Region and the preservation and utilization of archeological information from those parks.

Background

The Southeast Archeological Center was established in 1966 and joined the Southwest Archeological Center under the supervision of the Washington Division of Archeological Studies. In 1973, as part of the move to clarify the role of archeological centers and to associate them with universities with strong archeological programs, the center was moved onto the University of Florida campus in Tallahassee. At that time it was placed under the supervision of the Southeast Regional Office.

Current Status, Resources, and Organizational Requirements

In 1987 the center was authorized an annual operating budget of $462,600 and 18 FTEs. Additional project funding totaled $453,000. The center is headed by the regional archeologist, who reports to the associate regional director for operations in the Southeast Regional Office. The center is divided into two professional branches (Data Base, and Investigation and Evaluation) and an administrative support branch.
The center reviews all planning and environmental documents, development/study package proposals, and cyclic preservation and maintenance program projections. It identifies potential adverse effects on cultural resources, recommends mitigation, prepares investigation plans, and estimates the cost of the required work. The center also functions as a production unit, either accomplishing archeological investigations and reports in house or negotiating contracts with qualified bidders. The center maintains a cultural sites inventory of archeological sites. Site information produced by archeological surveys of parks is entered into the inventory and used to evaluate sites against the criteria of the National Register of Historic Places.

The center provides curatorial services for the preservation of the parks' archeological research collections. A central data repository is maintained, and information is distributed to park and central offices.

A cooperative agreement with Florida State University initiated in 1972 and renewed in 1979 provides the center with access to resources at low or no cost and greatly augments its field and analytical research capability. The center occupies a total of 5,560 square feet, approximately half of which is used for collections storage, a fourth for laboratories, and a fourth for offices. About 80 percent of the needed space has been assigned for the center's use by the university's Department of Anthropology. The remainder is leased under a GSA contract for $3,298 per year. The current lease expires in May 1988. The university provides all maintenance, custodial services, and utilities
(except telephone service) at no additional cost, and it makes a wide variety of facilities and equipment (computers, storage, microscopes, x-ray equipment, laboratory space) available at either a reduced or no cost. The assistant director for archeology conducted an independent survey of the space utilized by the center and concluded that there is perhaps five percent more working laboratory space than is necessary for the center to carry out its functions in an efficient manner; however, additional space is needed to meet NPS curatorial standards.

The 1983 Realignment Committee recommended that the underwater unit be phased out, which has been accomplished. The center now obtains needed underwater archeology services from the Southwest Region on a refundable basis. The committee also recommended that the region study the possibility of combining the Southeast Archeological Center and the Southeast Cultural Resources Preservation Center into a single office in Atlanta. That study was completed in February 1985 and concluded that the costs of moving the center would far outweigh any potential savings that might result, and that substantial benefits accrue to the Service because of the center's present location.

The last operations evaluation of the center was performed in 1986. A number of changes have been implemented following the review, which has improved the center's operations.
Alternatives Considered

1. Retain the center at its present location.

2. Move the office to Atlanta, Georgia, as previously proposed.

3. Eliminate the function.

SOUTHEAST CULTURAL RESOURCES PRESERVATION CENTER

The Southeast Cultural Resources Preservation Center, created in 1984, brings together in one unit the historical, architectural, and curatorial disciplines concerned with the management and preservation of the Southeast Region's cultural resources. The center is the focal point for all cultural resource management programs, except archaeology, in the region.

Current Status, Resources, and Organizational Requirements

In FY 1987 the center was authorized an annual operating budget of $543,900 and 12 FTEs. Project funding totaled an additional $839,500. Organizationally the center operates as a field unit under a chief who reports to the associate regional director for operations in the Southeast Region.
Staffing at the center includes a historian, historical architects and technicians, a historical preservation conservator, project supervisors, museum curators and aids, administrative and clerical personnel, a contract specialist, and exhibit specialists with carpentry, masonry, and metalwork skills. The regional historian, regional historical architect, and regional curator are all stationed at the center.

The staff ensures that architectural preservation undertakings comply with all applicable laws, regulations, policies, and standards. They assist in the review of cultural resource management plans, programs, and other management documents, and serve as consultants to, or members of, regional planning teams. The center maintains a close working relationship with the southeast archeological center to ensure that all historic preservation and archeological projects are coordinated. The center also assists as requested in setting architectural and historic research and project funding priorities and in formulating general guidance and policy in matters of cultural resource management for the Service. It serves, as appropriate, as coordinator for investigations, planning, and management and operations activities conducted by the Denver Service Center and the Harpers Ferry Center.

The center has an agreement with the North Atlantic Historic Preservation Center for testing and analysis of original fabrics and materials in exchange for the sharing of technical information secured from preservation projects performed in the Southeast Region. It appears that both organizations are satisfied with the memorandum of understanding.
between the two regions. Apparently at one time it was envisioned that the Southeast center would mirror the North Atlantic center and develop the same capabilities for preservation of historical structures. However, these capabilities were never developed.

The Southeast Cultural Resources Preservation Center has been the subject of several evaluations in recent years. The 1983 Realignment Committee recommended a study to determine if combining the archeological center with the resource preservation center would result in economies. A complete management study was conducted by the Southeast Regional Office in 1985 and concluded that no economies would result from consolidation.

An operations evaluation, also conducted in 1985, recognized a coordination and communications problem between the center, the regional office, and the archeological center. That study recommended exploration of moving most of the center staff back to the regional office. The cost of such a move has been estimated at $60,000; however, it has also been reported that improved operations would justify the cost.

The center is currently located 25 miles from the regional office in Chattahoochee National Recreation Area. Much of the work of the professional staff involves regional programs and must be coordinated with other members of the regional staff. Coordination is difficult because of the physical separation.
Alternatives

1. Retain the center as it is currently organized.

2. Return the chief, regional historical architect, regional curator, regional historian, and associated personnel to the regional office. Retain a small number of project-related personnel at the center.

3. Eliminate the center.

NORTH ATLANTIC HISTORIC PRESERVATION CENTER

The North Atlantic Historic Preservation Center, currently located in the Charlestown Navy Yard unit of Boston National Historical Park, is the North Atlantic Region's primary unit for the preservation of historic structures. The center, which has been in existence for approximately 10 years, has developed a technical expertise in paint and mortar analysis that has been used in 23 parks in seven regions outside the North Atlantic Region, and by other government agencies and private institutions, as well.
Current Status, Resources, and Organizational Requirements

In 1987 the center was authorized an annual operating budget of $271,500 and 43 FTEs. Project funding totaled an additional $815,800 (see tables 10 and 11). The center is managed by the chief of historic preservation/regional historical architect, who is under the direct supervision of the associate regional director for planning and resource preservation in the North Atlantic Region. Approximately 75 percent of the 1987 program was project funded. Previous years' funding levels reflect a similar ratio.

The center has developed the facilities for a scientific approach to historic preservation and rehabilitation. Its x-ray capabilities and electronic microscopic facilities can be used to analyze historic fabric as well as paint and mortar. In addition to the laboratory facilities, the center also provides on-site technical supervision for the rehabilitation and restoration of historic structures in the North Atlantic Region. The well-publicized restoration of the Statue of Liberty was supervised by the center staff. The center maintains a field office in New York City, which provides assistance to the parks in the New York-New Jersey area.

The center also provides actual working teams to the parks in the region for accomplishing rehabilitation and restoration projects. The work is usually accomplished by staff exhibit specialists and other specialists on the staff.
Table 10: Staffing, North Atlantic Historic Preservation Center, FY 1987

**Permanent Positions**

<table>
<thead>
<tr>
<th>Position Description</th>
<th>FTEs</th>
</tr>
</thead>
<tbody>
<tr>
<td>exhibit specialist (2 GS-11, 1 GS-12)</td>
<td>3</td>
</tr>
<tr>
<td>historical architect (1 GM-14, 4 GS-12, 1 GS-11)</td>
<td>6</td>
</tr>
<tr>
<td>conservator (GS-11)</td>
<td>3</td>
</tr>
<tr>
<td>historian (GS-12)</td>
<td>1</td>
</tr>
<tr>
<td>writer-editor (GS-11)</td>
<td>1</td>
</tr>
<tr>
<td>administrative technician (GS-7)</td>
<td>1</td>
</tr>
<tr>
<td>secretary (GS-5)</td>
<td>1</td>
</tr>
</tbody>
</table>

**Subtotal**                                                  **16**

**Temporary Positions**

<table>
<thead>
<tr>
<th>Position Description</th>
<th>FTEs</th>
</tr>
</thead>
<tbody>
<tr>
<td>architectural technician (GS-7)</td>
<td>5</td>
</tr>
<tr>
<td>clerk typist (GS-4)</td>
<td>1</td>
</tr>
<tr>
<td>exhibit specialist (GS-11)</td>
<td>1</td>
</tr>
<tr>
<td>laborer (WG-3)</td>
<td>6</td>
</tr>
<tr>
<td>painter worker (WG-7)</td>
<td>1</td>
</tr>
<tr>
<td>woodcraftsman (WG-10)</td>
<td>2</td>
</tr>
<tr>
<td>carpenter worker (WG-7)</td>
<td>3</td>
</tr>
<tr>
<td>carpenter (WG-9)</td>
<td>4</td>
</tr>
<tr>
<td>carpenter helper (WG-5)</td>
<td>3</td>
</tr>
<tr>
<td>painter helper (WG-5)</td>
<td>1</td>
</tr>
</tbody>
</table>

**Subtotal**                                                  **27**

**Total**                                                **43**

Table 11: Funding Sources, North Atlantic Historic Preservation Center, FY 1985-87

<table>
<thead>
<tr>
<th>FY</th>
<th>ONPS</th>
<th>Project</th>
<th>Percent from Projects</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>87</td>
<td>$271,500</td>
<td>$815,797</td>
<td>75</td>
<td>$1,087,297</td>
</tr>
<tr>
<td>86</td>
<td>$251,400</td>
<td>$746,163</td>
<td>74</td>
<td>$997,563</td>
</tr>
<tr>
<td>85</td>
<td>$248,400</td>
<td>$712,657</td>
<td>74</td>
<td>$961,057</td>
</tr>
</tbody>
</table>
Historic structure reports are prepared by the center's staff, and any contracts affecting historic structures are either prepared by the staff or at least reviewed and approved from a preservation standpoint.

A memorandum of understanding has been executed between the center and the Southeast Region formalizing a reciprocal agreement between the two offices. The center has assisted the region on several projects, and both parties seem satisfied with the arrangement. The center employees are especially satisfied because of the variety of work other regions have to offer, which they believe increases their professionalism.

The staff of the center also maintains a close working relationship with Boston University. Student interns work at the center, and various members of the staff lecture at the University. The center has also maintained some association with Columbia University.

Current plans call for the relocation of the present facility from the Charlestown Navy Yard to Lowell National Historical Park within the year at a cost of approximately $1.5 million. The North Atlantic Region also intends to increase the staff with the addition of a metals conservator from the regional office and the anticipated absorption of the Eastern Archeological Field Laboratory. The laboratory, which has 11 FTEs, is currently located within the same facility as the center in Charlestown Navy Yard. When these two organizations are merged, it is proposed that the name of the new organization be the North Atlantic Cultural Resources Center. The center's manager will report to the associate regional director for planning and resources preservation.
Alternatives

1. Increase the capabilities of the center, so that more work can be accomplished for other regions.

It appears that the Southeast and National Capital regions are interested in utilizing the services of the center to a greater extent. The Southeast Region has significantly pulled back from developing a center comparable to the North Atlantic center, as was once envisioned. It appears that an even closer working relationship can be developed between the two regions, perhaps even to the extent of setting up a field office of the North Atlantic center in Atlanta. There does not appear to be a great deal of interest in developing a relationship with the center in the Mid-Atlantic Region. This is probably due to the relationship that the Mid-Atlantic Region has with the Williamsport Training Center. Of course, any further increase in the workload of the center for other regions will only intensify the problem in priority setting. This problem could be resolved by instituting a "board of directors" made up of representatives from each region involved to set priorities for each fiscal year.

2. Continue the current operation of the center.
The center is performing in an outstanding manner. It has been suggested that there is little backlog in historic preservation in the North Atlantic Region, primarily because of the efforts of the center and its staff. Without the services of the center it is doubtful whether the restoration of the Statue of Liberty could have been accomplished in an acceptable manner (from a preservation standpoint). The capabilities of the center are well known, as is indicated by projects accomplished for others. The regional director, associate regional director, and the center's manager are well satisfied with the performance of the center. If anything, the center has been too successful in that a problem appears to be developing with the setting of priorities. Some superintendents within the North Atlantic Region are questioning why their work is not being accomplished on a timely basis (as they see it) while other regions' work is being accomplished.

3. Remove control of the center from the North Atlantic Region and have it operate independently of the regions, reporting either to WASO or the Denver Service Center.

If this alternative was chosen it would violate two standing policies of the National Park Service. Denver is a totally project funded organization, while the center is not. If the center reported directly to WASO, more operations would be removed from the field. This alternative is not considered to be in the best interest of the National Park Service.
The Boise Interagency Fire Center was established in 1969. The National Park Service first assigned personnel to the center in 1973. The Bureau of Land Management, Bureau of Indian Affairs, National Park Service, and Fish and Wildlife Service (all U.S. Department of the Interior), the Forest Service (U.S. Department of Agriculture), and the National Weather Service (U.S. Department of Commerce) comprise the federal agencies joined together at this facility to conduct a nationwide wildland fire management program. The NPS Branch of Fire Management operates the Service's national fire program out of the center and coordinates its resources with the resources of the other agencies involved. The standardization of fire suppression and management methods, training, equipment, communications systems, policies, and programs has been achieved on a servicewide and interagency basis.

Current Status, Resources, and Organizational Requirements

In 1987 the center was authorized $442,600 and 5 FTEs. The branch is a part of the Division of Ranger Activities (WASO) but is located in Boise, Idaho. Administrative support for the center comes from the Pacific Northwest Region.

The National Park Service has the smallest program of any agency at the center in terms of personnel and budget, but it benefits from the entire
center capabilities as a result of its involvement. The NPS Branch of Fire Management supports all parks and regional offices by developing and providing program management, policy, guidelines, a training curriculum (and instructors where necessary), and technical guidance on equipment and operations. The center reviews fire management plans and may provide direct assistance to parks in the form of planning, fire suppression, or prescribed fire management. The center dispatches fire-suppression crews and equipment when fires are in progress.

COOPERATIVE PARK STUDY UNITS

Cooperative park study units (CPSUs) are scientific research centers operated jointly by the National Park Service and participating universities and colleges. The program was established in 1970 as a cost-effective way of providing the large amount of natural and social scientific information required by the Service without significantly expanding the science staff. (The Service has some 100 scientists involved in research as direct employees.) The first CPSU was created by a memorandum of agreement between the National Park Service and the University of Washington at Seattle.
Current Status, Resources, and Organizational Requirements

Partly because of a lack of an exact definition, there are conflicting reports on how many CPSUs exist in the Service and the amount of funding we expend annually in this area. The ten regions recently reported a total of 18 CPSUs and annual funding of approximately $5 million. The number of personnel stationed at universities does not exceed 30. Some regions have cooperative agreements or memorandums of understanding with various universities in addition to the more formal CPSU arrangements. Some CPSUs have several NPS personnel on site and others have none.

The CPSU programs are based on research needs identified in resource management plans, visitor use plans, interpretive plans, or as special regional needs. The activities at each institution are supervised by either a government scientist or a university scientist, or both. The regional chief scientist, who is responsible for the overall regional science program, coordinates the work of the park scientists with that of the CPSU programs. The regional chief scientist is the acting officer's representative for contracts let to each CPSU in the region and is responsible for making the proper budget requests each year in order to fund the regional program.

The CPSUs not only conduct natural and social science research, they also provide technical advice and professional services to the parks and regional offices. They also provide information for use in solving
management problems and for the resources basic inventory (information base) of each park.

The general consensus of NPS personnel contacted was that the CPSU program has been successful in obtaining research useful in solving management problems in a cost-effective manner. Cost benefits often result from reduced overhead, free consultative services, free storage, and use of university computers, laboratories, libraries, and other facilities. Graduate students are often associated with research projects, providing relatively inexpensive and highly motivated labor. The primary justification for the establishment of the CPSU is the research support it can provide. Some additional reasons for locating NPS scientists in colleges and universities are the opportunities they gain to participate in seminars, to supervise graduate student research, and to otherwise be exposed to new ideas and motivated to excel. At the same time, association with researchers in many scientific fields provides the NPS scientists with access to information needed to solve problems that must be investigated from a multidisciplinary approach. Not all of these advantages exist in every instance.

Alternatives

No organizational alternatives were developed because of the special relationships with multiple universities developed under the CPSU program.
NATIONAL REGISTER PROGRAMS

The external cultural resource programs of the National Park Service are referred to as the National Register programs. These programs are

- National Register of Historic Places
- Historic preservation tax incentives
- Archeological assistance
- Historic Preservation Fund
- National historic landmarks
- Cultural resource planning assistance to state and federal agencies
- State program review
- Historic American Buildings Survey/Historic American Engineering Record
- Preservation technical assistance
- Certified local governments

The legislative base for these programs includes the National Historic Preservation Act of 1966 (as amended in 1980), the Archeological and Historic Preservation Act of 1974, the Archeological Resources Protection Act of 1979, the Historic Sites Act of 1935, and the Tax Reform Act of 1976 (as amended in 1981 and 1986). Regional clients include the states through the state liaison officers, other federal agencies, preservation organizations, and the private sector.

Background

Until 1978 the responsibilities and authorities of the secretary of the interior for carrying out national archeology and historic preservation program oversight, coordination, and assistance, as provided for under
the above legislation, was delegated to and carried out by the National Park Service. Except for three interagency archeological field offices operated under Washington line management, the program functions were carried out in Washington under the direction of the associate director for archeology and historic preservation. In large measure, state historic preservation offices served as field offices and assumed a share of the work both in implementing their historic preservation program responsibilities and in assisting the Service with its responsibilities, such as implementation of the tax act rehabilitation program.

In January 1978 the external historic preservation programs were transferred to the newly created Heritage Conservation and Recreation Service. Under that agency there was some realignment of functions, but the programs remained intact and were conducted on a centralized basis until October 1980, when responsibilities for various operational aspects were transferred from the Washington Office to the regional offices. The regional programs incorporated interagency archeology field offices. The reasons given for regionalization were to improve use of staff time, provide greater accountability, and locate government where it could best serve the public.

In May 1981 Secretarial Order 3060 abolished the Heritage Conservation and Recreation Service and transferred the archeology and historic preservation programs back to the National Park Service and placed them in a newly created Office of the Associate Director, Archeology and Historic Preservation. The eight region organization was consolidated into
five regions to concentrate limited resources so that a minimum program could be accomplished. This reorganization took effect beginning in fiscal year 1983. The five regions are listed below, along with their relationship to the current 10 NPS regions.

<table>
<thead>
<tr>
<th>National Register Program Region</th>
<th>NPS Region/States</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alaska Region</td>
<td>Alaska Region</td>
</tr>
<tr>
<td>Western Region</td>
<td>Western Region, Pacific Northwest Region</td>
</tr>
<tr>
<td>Rocky Mountain Region</td>
<td>Rocky Mountain Region, part of Midwest Region (NE, KS, MO, IA, MN, WI, IL), part of Southwest Region (NM, TX, OK)</td>
</tr>
<tr>
<td>Southeast Region</td>
<td>Southeast Region, part of Southwest Region (LA)</td>
</tr>
<tr>
<td>Mid-Atlantic Region</td>
<td>Mid-Atlantic Region, North Atlantic Region, National Capital Region, part of Midwest Region (IN, OH, MI)</td>
</tr>
</tbody>
</table>

Under this organizational arrangement it has been necessary for the program region to ensure that all activities in states within other NPS regions are coordinated with that region. This process has not always been satisfactory, particularly since the Midwest and Southwest regional directors have to be aware of activities in two other program regions.

Also in fiscal year 1983, the National Register programs were placed under the associate director for cultural resources, along with the park cultural resource management programs. Four regions have now organized their programs so that the park cultural resource management programs are under the same associate regional director as the National
Register programs (in the Alaska and Rocky Mountain regions the programs are under the same division). The Southeast Region is in the process of consolidating both programs under the same associate.

Current Status, Resources, and Organizational Requirements

With the consolidation of the program into five regions and increased appropriations in fiscal years 1984 and 1986, the National Register programs have been adequately funded to carry out basic requirements in all program areas. Table 12 outlines the distribution of financial and personnel resources for the National Register programs.

Table 12: National Register Program Resources, by Activity, FY 1985

<table>
<thead>
<tr>
<th>Regions</th>
<th>Funds ($000)</th>
<th>FTEs</th>
<th>WASO Funds ($000)</th>
<th>FTEs</th>
<th>Total Funds ($000)</th>
<th>FTEs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tax act certification</td>
<td>$1,180</td>
<td>38.0</td>
<td>$ 842</td>
<td>96.6</td>
<td>$2,105</td>
<td>54.0</td>
</tr>
<tr>
<td>Preservation information</td>
<td>60</td>
<td>1.7</td>
<td>150</td>
<td>3.0</td>
<td>210</td>
<td>4.7</td>
</tr>
<tr>
<td>National historic landmarks</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>technical assistance</td>
<td>316</td>
<td>8.8</td>
<td>116</td>
<td>2.0</td>
<td>432</td>
<td>10.8</td>
</tr>
<tr>
<td>designation</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Planning assistance</td>
<td>87</td>
<td>2.9</td>
<td>80</td>
<td>2.0</td>
<td>167</td>
<td>4.9</td>
</tr>
<tr>
<td>Archeology</td>
<td>800</td>
<td>19.0</td>
<td>526</td>
<td>12.0</td>
<td>1,326</td>
<td>31.0</td>
</tr>
<tr>
<td>HABS/HAER</td>
<td>136</td>
<td>6.6</td>
<td>864</td>
<td>22.0</td>
<td>900</td>
<td>28.6</td>
</tr>
<tr>
<td>State program review</td>
<td>278</td>
<td>7.2</td>
<td>88</td>
<td>2.0</td>
<td>366</td>
<td>9.2</td>
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<tr>
<td>Certified local governments</td>
<td>65</td>
<td>2.5</td>
<td>50</td>
<td>1.0</td>
<td>125</td>
<td>3.5</td>
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<tr>
<td>National Register</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Historic Preservation Fund</td>
<td>425</td>
<td>12.4</td>
<td>687</td>
<td>6.6</td>
<td>1,112</td>
<td>19.0</td>
</tr>
</tbody>
</table>

$3,347 99.1 $4,349 96.6 $7,696 195.7
With the exception of the HABS/HAER, National Register of Historic Places, technical publication development, and congressional reporting requirements, the programs are operational at the regional level, and the Washington Office is responsible for program development and guidance, policy, and program oversight.

In all five regions the programs are either organized within the same division or in no more than two closely linked divisions. At the Washington Office level, however, the programs are divided among four divisions reporting to the associate director and one division reporting to the assistant director for archeology, who in turn reports to the associate director:

Interagency Resource Division
- National Register of Historic Places
- Historic Preservation Fund (apportionment, reporting)
- certified local governments
- national historic landmark boundary survey
- state program review

Preservation Assistance Division
- historic preservation tax incentives
- preservation technical assistance
- Historic Preservation Fund (grants administration)
- national historic landmarks technical assistance and reporting to Congress

HABS/HAER Division
- Historic American Building Survey and Historic American Engineering Record

History Division
- national historic landmark evaluation and nomination
Program elements of the national historic landmarks program are administered in three separate divisions, and program elements of the historic preservation program are administered in two separate divisions. Since one professional at the regional level generally handles several elements of the National Register programs, close program coordination at the Washington level among the five program divisions is essential to ensure clear guidance is given to the region. Sometimes this does not occur.

The tax act certification program has generally dominated the workload at the regional level, utilizing 36 percent of the resources available to the regions to process over 5,989 certification applications per year. The regions' ability to carry out the other six major program responsibilities has been diminished by this nondiscretionary work, which uses a major portion of available resources to meet review deadlines governed by regulation.

Diminishing appropriations in fiscal years 1986 and 1987 have required a greater portion of the funding to go toward increasing personnel costs. This has further constrained program options both in the regions and in the Washington Office. To varying degrees, the programs not receiving adequate attention are (1) preservation technical information, (2) condition assessments and technical assistance to national historic landmarks, (3) training and assistance to federal agencies in carrying out their historic preservation responsibilities, (4) state comprehensive planning programs, and (5) certified local government preservation.
programs. The following briefly outlines the nature of each program and the issues that need to be addressed.

**National Register of Historic Places.** The National Register of Historic Places is the nation's official list of properties significant in American history, architecture, archeology, engineering, and culture. The National Historic Preservation Act, as amended, directs the secretary of the interior to maintain the National Register, to develop guidelines and regulations for nomination, to consider appeals, and to make determinations of eligibility of properties at the request of federal agencies and where private property owners object to listing.

State historic preservation officers set priorities for nominations, notify local officials and property owners of proposed nominations, and submit completed nominations. Federal agencies also nominate properties under their jurisdiction. The National Register staff processes up to 3,900 nominations annually, publishes the list of pending nominations in the *Federal Register*, reviews nominations, and lists, returns, or rejects the nominations within 45 days of receipt. Standards, guidelines, and technical information concerning the registration process and the determination of eligibility process are provided to states, federal agencies, local governments, and others. The program is fully centralized in the Washington Office.

A number of respondents to the questionnaire recommended that the National Register be decentralized and made operational at the regional
office level. Generally this has been rejected in the past on the basis that the National Register is the nucleus of the historic preservation program and therefore should remain centralized to ensure its integrity. Currently legislation has been proposed by the National Park Service that would give states authority to list properties of state and local significance. Until final disposition of this legislation is known, the question of decentralization to the regional level is a moot point.

Tax Act Certification Program. The Tax Reform Act of 1976, the Revenue Act of 1978, the Economic Recovery Tax Act of 1981, and the Tax Reform Act of 1986 require the secretary to make certifications of historic district statutes and of state and local districts, certifications of whether structures contribute to the significance of a registered historic district, and certifications of rehabilitation in connection with tax incentives. To qualify for the investment tax credit, property owners must establish that the property is a certified historic structure and that the rehabilitation work will preserve the historic character of the structure.

States provide advice to the National Park Service on certification requests. State suggestions and the application materials are then professionally evaluated in the five National Park Service regional offices according to standards published in title 36, part 67 of the Code of Federal Regulations.
Technical Preservation Information. The National Park Service develops technical information, guidelines, and training materials that assist property owners in undertaking responsible historic preservation work for protection of the nation's historic resources. The 1980 amendments to the Historic Preservation Act direct that professional methods be developed for use by federal agencies, state and local governments, private organizations, and individuals for the preservation and rehabilitation of historic properties. A large part of the demand for reliable technical information has been generated by the tax incentives program.

National Historic Landmarks. Technical assistance is provided to national historic landmark owners to help them adopt management practices that protect the property's nationally significant values. A condition assessment program for threatened national historic landmarks was implemented in 1985, and more than 30 landmarks have been inspected to date. Threatened national historic landmarks are targeted for in-depth inspections. The resulting reports identify necessary preservation work and the costs associated with undertaking this work.

The National Park Service prepares the annual section 8 report to Congress describing the status of national historic landmarks whose historic integrity is damaged or threatened. Over 1,700 landmarks are monitored by regional offices working with state historic preservation offices, the National Trust for Historic Preservation, local government officials, local preservation organizations, and landmark owners. Emphasis is also placed on correcting boundary descriptions of national
historic landmarks with boundaries that do not adequately define the landmark.

**Cultural Resources Management Planning and Standards.** The National Historic Preservation Act provides for the secretary to advise federal agencies on establishing a program to locate, inventory, and nominate properties under their control that appear to qualify for inclusion in the National Register and to promulgate standards and guidelines for accomplishing these and other federal agency responsibilities. The act also requires the secretary to provide training, information, and professional methods and techniques for preserving historic properties and for administering historic preservation programs.

The secretary of the interior's "Archeological and Historic Preservation Standards and Guidelines" serve as the basic guide to preservation planning, identification, evaluation, registration, and treatment for all types of cultural resources. Regional offices are responsible for providing technical assistance to federal and state agencies and others in applying the standards for conducting projects that adapt the resource protection planning process to their needs.

**Archeological Assistance.** Archeological components of the secretary's standards and guidelines mentioned above are the focal point of the archeological assistance program the National Park Service is providing to other Interior bureaus and to other federal agencies on the location, evaluation, nomination, and preservation of archeological properties.
This responsibility rests with the departmental consulting archeologist, who is also the assistant director for archeology. The program is carried out by the Division of Archeological Assistance in the Washington Office and the archeological assistance program staff in the regions. Federal coordination and training are carried out at both the national and regional office levels. The Service concentrates on guiding governmentwide archeology and improving the archeological capability of other agencies, but it limits its direct assistance to agencies that are unable to do their own archeological work. The activities are intended to have the dual objective of solving specific archeological problems and improving the independent capabilities of other agencies. Resources are being allocated to develop a national archeological data base to provide a comprehensive base of archeological project information to federal and state agencies.

Historic American Buildings Survey and Historic American Engineering Record. The Historic American Buildings Survey and the Historic American Engineering Record (HABS/HAER) document significant examples of the nation’s architectural and engineering heritage through historic information, measured drawings, photography, and photogrammetry. This documentation is used to provide a basis for preservation planning, to allow accurate repair or reconstruction if the property is damaged by fire or other disaster, to serve as a beginning point for restoration or adaptive reuse, to provide a legally enforceable basis for preservation easements, to preserve a record of historic properties that cannot be preserved, and to provide comprehensive information for those interested in historic structures. Most documentation is produced by summer field
teams under the direct supervision of HABS/HAER personnel, by
architects and other professionals, and by contractors working to
HABS/HAER standards and subject to HABS/HAER approval.

The HABS/HAER collections, kept by the Library of Congress, are the
largest of their kind in the world. They include records on
approximately 21,800 buildings and structures in the form of 45,000
measured drawings, 118,000 photographs, and 66,000 data pages.

NATIONAL RECREATION PROGRAMS

Introduction

Within this report the external recreation programs administered by the
National Park Service are referred to as the national recreation programs.
These programs include

- Land and Water Conservation Fund
- urban park and recreation recovery
- rivers and trails
- surplus federal real property
- cooperative management
- recreation statistics and information
- federal recreation fee

Also included in this report is the national natural landmarks program.
Principal clients served are the states, through the state liaison officers, park departments, and natural resources departments. City and county park departments, community development agencies, local planning offices, conservation groups, and landowners form another level served by the programs.

Background

The national recreation programs were initially administered by the Bureau of Outdoor Recreation on a decentralized basis through eight regions. The boundaries of the regions were the same as the current National Park Service regional boundaries except that Nebraska and Kansas were administered by the Rocky Mountain Region and the northeast states were aligned somewhat differently.

In January 1978 the national recreation programs were combined with the natural landmarks program and with the archeological and historic preservation programs of the National Park Service in a newly created Heritage Conservation and Recreation Service under Executive Order 3017. Regional boundaries and the decentralized nature of the program were retained. When the Heritage Conservation and Recreation Service was abolished in May 1981, programs that were deemed duplicative or nonessential were dropped, and the remaining recreation programs were transferred to the National Park Service, along with those archeology and historic preservation programs that had initially come from the Service in
1978. At the same time funding and personnel levels were drastically reduced. In fiscal year 1980, what were known as the recreation and natural programs had funding of approximately $6.4 million (after deducting for overhead expenses) and 228 FTEs. Administrative support for the Land and Water Conservation Fund was $3.1 million after deducting for overhead expenses and 164 FTEs, and for the urban recovery program it was $3.2 million and 53 FTEs. Funding for urban recovery grants in fiscal year 1980 was $121 million, and for the Land and Water Conservation Fund it was $300 million.

**Current Status, Resources, and Organizational Requirements**

The national recreation programs are administered under the associate director for planning and development. The Land and Water Conservation Fund and the urban park and recreation rehabilitation program are administered by the Recreation Grants Division, while the rivers and trails, surplus property, cooperative management, recreation information, and fee programs are administered by the Recreation Resources Assistance Division. The Washington Office is responsible for program regulations, policy development, technical assistance and training for regional staff, overall grant funding control and tracking, program oversight, budget, and legislative support. Operational aspects of the programs are carried out at the regional office level as outlined later in this report.
The national recreation programs are still operated on a decentralized basis, through seven regions. Program boundaries conform with the boundaries of the NPS regions with two exceptions. The New England states (North Atlantic Region) and the area within the National Capital Region are administered by the Mid-Atlantic Region, and Alaska is administered by the Pacific Northwest Region. The programs are administered under an associate regional director who generally has responsibility for recreation, park planning, cultural, and environmental coordination programs. Regional offices are responsible for grant approvals and administration, and for working with states, federal agencies, cities, and the private sector in providing planning and cultural assistance. The closer the program to the client, the better the service delivery.

Fiscal year 1986 funding for administration of the national recreation programs is listed in table 13. Funding levels for fiscal year 1987 have changed very little.

The Land and Water Conservation Fund is the largest of the national recreation programs, making up about 60 percent of the available administrative funding. Rivers and trails make up 24 percent, recreation assistance programs 11 percent, and urban recovery programs 5 percent.

Funding available for grants totaled $48 million in fiscal year 1986 and $33 million in fiscal year 1987, compared to the $300 million in fiscal year 1980. New funding for the urban recovery program has not been available since fiscal year 1984.
Since fiscal year 1981 the administration has taken the position of zero funding for the Land and Water Conservation Fund and the urban recovery grant programs, and it has reduced funding for the rivers and trails program and the recreation assistance programs. In the case of the rivers and trails programs, Congress has added approximately $1 million to the administration's budget of approximately $400,000 for the past three years for state and local rivers conservation technical assistance. For the recreation assistance programs, Congress has doubled the approximately $300,000 requested in the budget for the past several fiscal years.
years. Nevertheless, funding for the recreation assistance and the rivers and trails programs (currently at $2.1 million) is only one-third what it was in fiscal year 1980. The majority of this ($1.5 million) is in the rivers conservation assistance program, with a majority of the current resources and effort focused in the Mid-Atlantic Region. The Land and Water Conservation Fund, with a much smaller grant program but a large and growing compliance responsibility, has less than one-half the FTEs it had in fiscal year 1980. FTEs for the urban recovery program are less than 12 percent the level authorized in fiscal year 1980, and administrative funds are inadequate to handle even this level of staffing.

**Land and Water Conservation Fund.** The Land and Water Conservation Fund Act was enacted in 1964 and authorizes the secretary of the interior to provide financial assistance to states for outdoor recreation purposes. Except for the apportionment of funds among states and the approval of contingency reserve projects, this authority has been delegated to the director of the National Park Service.

The act established a funding source for both federal acquisition of park, recreation, and wetlands real property and 50-50 matching assistance to state and local governments for recreation planning, acquisition, and development based on an approved state comprehensive outdoor recreation plan.

With the primary source of revenues provided by the outer continental shelf mineral leasing program, the size of the grant program to states
reached $369.8 million in fiscal year 1979, but it has since dropped to the current level of $32.7 million. The administration has not supported the grant program since fiscal year 1981, and it has requested zero funding each year. Funding for grants has been added on by Congress each fiscal year since 1982. The 75 FTEs for the administration of the program is less than one-half that available in fiscal year 1980. In 1987 approximately $3.4 million and 76 FTEs will be utilized to administer the program. The requested amount for fiscal year 1988 is $3.4 million.

Primary regional program functions include grant award and financial monitoring (35 percent of workload), state program review and project compliance inspections (20 percent), processing of requests to convert assisted land to other than outdoor recreation use (13 percent), state comprehensive outdoor recreation planning (12 percent), and technical assistance and administration of active projects (21 percent). The regions reported that administration of section 6(f)(3) conversions is a rapidly growing workload. As the grant award (including project amendments) and financial monitoring functions decrease with continued reduced funding, the compliance workload will continue to increase, along with project inspections and technical assistance to enforce title VI civil rights compliance requirements and section 504 handicapped accessibility requirements, which are now the responsibility of the National Park Service.

**Urban Park and Recreation Recovery Program.** The urban park and recreation recovery program was authorized by title X of the National
Parks and Recreation Act of 1978, which established a five-year program of grants to economically distressed local governments to restore recreation facilities that had fallen into disuse or disrepair, to encourage innovations in recreation services, to stimulate and support local commitments to recreation system recovery and maintenance, and to improve the management and delivery of recreation services to urban residents. Appropriations for grants have not been made since fiscal year 1984. Program activities have been focused on closing out prior-year rehabilitation, innovation, and recovery action program grants, conducting compliance inspections, processing or billings, and awarding a small number of grants and providing assistance to a limited number of cities for implementing recovery action programs. Grant funds are made available from unexpended funds recovered from previous grants. In fiscal year 1986 available grant funds amounted to $2.9 million. As these funds are expended, the granting activity will cease and the program will focus primarily on compliance and technical assistance activities.

With a limited amount of funds available for this program ($340,000 servicewide) and limited staffing (5.2 FTE for 7 regions), the Service's ability to provide an effective program will be limited. Table 14 provides a summary of FTEs and funding by region.

Federal Surplus Real Property Program. PL 91-485 and PL 95-625 authorize the identification and disposal of federal surplus real property for park and recreation purposes at no cost to state and local governments. Also provided for is the requirement that the property be
Table 14: Urban Park and Recreation Recovery Program Resources, by Region, FY 1986

<table>
<thead>
<tr>
<th>Region</th>
<th>Funding ($ thousands)</th>
<th>FTEs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mid-Atlantic</td>
<td>$104</td>
<td>2.0</td>
</tr>
<tr>
<td>Midwest</td>
<td>47</td>
<td>1.4</td>
</tr>
<tr>
<td>Western</td>
<td>30</td>
<td>0.8</td>
</tr>
<tr>
<td>Southeast</td>
<td>29</td>
<td>0.7</td>
</tr>
<tr>
<td>Southwest</td>
<td>24</td>
<td>0.8</td>
</tr>
<tr>
<td>Pacific Northwest</td>
<td>5</td>
<td>0.1</td>
</tr>
<tr>
<td>Rocky Mountain</td>
<td>5</td>
<td>0.1</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>$244</strong></td>
<td><strong>5.9</strong></td>
</tr>
</tbody>
</table>

used in accordance with the terms and conditions set forth in the deed of transfer, including a program of utilization which the local jurisdiction has prepared. Regional offices are responsible for the day-to-day management of the program, including processing surplus property applications, recommending changes in programs of utilization to the General Services Administration, and compliance inspections and reporting. Seventeen properties were conveyed in fiscal year 1986, eight in the Mid-Atlantic region.

Regions inspected from 18 (Pacific Northwest) to 101 (Southeast) properties and acted on 67 changes in program utilization. The program is limited in size. Table 15 provides a breakdown of FTE and funding for each region in fiscal year 1986.

**Cooperative Management.** The Sikes Act Amendment, PL 90-465, authorizes the secretary of defense to carry out a program for the
development, enhancement, operation, and maintenance of public outdoor recreation resources at military reservations in accordance with a cooperative plan mutually agreed upon by the secretary of defense and the secretary of the interior. The regions negotiate cooperative agreements with military bases to provide for public recreation wherever possible and provide recreation planning assistance to bases when requested by the base commanders.

Current regional functions include maintaining existing cooperative agreements with the military bases located within the region. Within the seven regions only 1.2 FTEs are available for this program. Five regions reported no resources allocated to this function.

**Rivers Program.** Pursuant to section 5(a) of the Wild and Scenic Rivers Act, the Service is responsible for completing certain wild and scenic river studies to determine whether a river is suitable for the national
system. The Service also assures adequate review of potential projects adversely affecting wild and scenic rivers. The National Park Service also delivers technical help to state and local governments in river conservation and reviews applications by states for the addition of state rivers to the national wild and scenic rivers system. State and local rivers conservation assistance includes assisting state agencies in the development of statewide river conservation assessments, initiating cooperative river corridor management plans on nationwide river inventory segments, supporting established state river programs on designated river segments; conducting river conservation training workshops, and conducting demonstration projects to develop less-than-fee-acquisition river conservation strategies.

Approximately $1.1 million has been added to the NPS budget by Congress in fiscal years 1985, 1986, and 1987, and somewhat lesser amounts in fiscal years 1983 and 1984, for state and local river conservation assistance. The administration's position has been that such assistance is not essential, and therefore it has supported only minimal funding of $400,000 or less for the rivers and trails study program.

The conservation assistance program has been concentrated in the Mid-Atlantic region where expertise and the capability to deliver technical assistance has been developed over the past several years. Table 16 shows the distribution of resources in fiscal year 1986.
Table 16: River Program Resources, by Region, FY 1986

<table>
<thead>
<tr>
<th>Region</th>
<th>Funding ($ thousands)</th>
<th>FTEs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mid-Atlantic</td>
<td>$430</td>
<td>9.0</td>
</tr>
<tr>
<td>Pacific Northwest*</td>
<td>60</td>
<td>3.0</td>
</tr>
<tr>
<td>Rocky Mountain</td>
<td>51</td>
<td>1.6</td>
</tr>
<tr>
<td>Southeast</td>
<td>22</td>
<td>0.5</td>
</tr>
<tr>
<td>Western</td>
<td>25</td>
<td>0.3</td>
</tr>
<tr>
<td>Midwest</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Southwest</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>$588</strong></td>
<td><strong>14.4</strong></td>
</tr>
</tbody>
</table>

*Program involves some reimbursable funding from the Bonneville Power Authority

**Funding for fiscal 1987 has been increased for these regions.

The major portion of the Service workload for this program has been in the Mid-Atlantic Region, which has conducted workshops and training for other regions. Other regions have expressed an interest in expanding this program.

The Mid-Atlantic experience shows that a consolidated program involving several regions (Mid-Atlantic, North Atlantic, and National Capital) can be effectively run.

**Trails Program.** Pursuant to sections 4 and 5 of the National Trails System Act the Service is authorized to study potential additions to the national trails system and to provide technical assistance and information to states, communities, and the private sector on all aspects of trail planning, designation, and management.
Because of limited or no funding, very little effort is expended by the Service on this program. Five regions indicated little or no activity in fiscal year 1986. Table 17 shows the distribution of resources in fiscal year 1986.

Table 17: Trail Program Resources, by Region, FY 1986

<table>
<thead>
<tr>
<th>Region</th>
<th>Funding ($ thousands)</th>
<th>FTEs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Southeast*</td>
<td>$64</td>
<td>1.0</td>
</tr>
<tr>
<td>Midwest</td>
<td>9</td>
<td>0.5</td>
</tr>
<tr>
<td>Western</td>
<td>17</td>
<td>0.1</td>
</tr>
<tr>
<td>Mid-Atlantic</td>
<td>10</td>
<td>0.5</td>
</tr>
<tr>
<td>Rocky Mountain</td>
<td>5</td>
<td>0.2</td>
</tr>
<tr>
<td>Pacific Northwest</td>
<td>0</td>
<td>0.3</td>
</tr>
<tr>
<td>Southwest</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

Totals          $105   2.6

*Program reduced to 0.3 FTE and $25,000 in fiscal year 1987.

National Natural Landmarks Program. The national natural landmarks program was established in 1962 to encourage preservation of the best examples of the major biotic communities and geologic features of the 50 states and territories. To date about 580 areas have been placed on the National Registry of National Natural Landmarks, 56 natural region inventory studies have been completed and an annual report on threatened or damaged landmarks is submitted to Congress each year. Activities under this program focus on conducting annual on-site evaluations and identifying real or potential threats of damage to
landmarks, providing guidance and advice to others in conducting inspections of landmarks, preparing evaluation reports and the annual section 8 report and providing technical assistance on the conservation of landmark sites.

The Washington Office is responsible for overall program development and implementation. The WASO staff reviews and approves evaluation reports for proposed landmarks and forwards those deemed appropriate for secretarial approval. It also maintains the official Registry of Natural Landmarks and prepares the annual section 8 report to Congress.

Regions conduct site evaluations on 2,500 potential landmarks, monitor the status of designated landmarks, and provide technical assistance to landmark owners.

Appropriations of $157,000 for this program have been about $120,000 below the level necessary to support the WASO staff and must be supplemented by other sources, principally by National Register of Historic Places program funding. Appropriated funding for regional coordinators is not available. One region reported using $14,000 from the Land and Water Conservation Fund, and another reported using $45,000 from ONPS funds in FY 1987. It is estimated that $100,000 is needed to provide minimal support for the regional program. Table 18 shows the distribution of resources for fiscal year 1986.
Table 18: National Natural Landmarks Program Resources, by Region, FY 1986

<table>
<thead>
<tr>
<th>Region</th>
<th>Funding ($ thousands)</th>
<th>FTEs</th>
</tr>
</thead>
<tbody>
<tr>
<td>WASO</td>
<td>$157.0</td>
<td>6.2</td>
</tr>
<tr>
<td>Mid-Atlantic</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Pacific Northwest</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Midwest</td>
<td>0</td>
<td>0.7</td>
</tr>
<tr>
<td>Western</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Southwest</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Rocky Mountain</td>
<td>0</td>
<td>0.8</td>
</tr>
<tr>
<td>Southeast</td>
<td>14.4 (LWCF)</td>
<td>0.5</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>$171.4</strong></td>
<td><strong>8.2</strong></td>
</tr>
</tbody>
</table>

Several regions have not formally allocated FTEs and funding to this program, although work is performed. For fiscal year 1986, three regions reported conducting both inspections and evaluations and two regions inspections only.

At the Washington level, program responsibility rests with the associate director for cultural resources. Currently five regions have placed national natural landmarks within the science program.

**Alternatives**

1. Consolidate the Land and Water Conservation Fund program into fewer regions.
Of the national recreation programs, the two most viable in terms of funding and ability to support a decentralized regional program are the Land and Water Conservation Fund program and the rivers and trails program (with the majority of the funding for the state and local rivers conservation assistance program). Without the funding of the Land and Water Conservation Fund, in particular, it would not be possible for the other recreation programs to be carried out in seven regions, because sufficient professional staff and program support could not be provided. While some aspects of the conservation fund program (compliance inspections, state program reviews, technical assistance, and state comprehensive outdoor recreation planning) cannot be fully carried out, regional and WASO program managers believe that regional integrity should be maintained and that program effectiveness would be hurt if the program was administered in fewer regions. For the next several years, the workload in program compliance will continue to grow and tend to offset the reduction in the grant approval and administration workload as it decreases with the reduction in grant funds.

2. Consolidate the smaller recreation programs into fewer regions.

Recreation assistance programs (including surplus property, cooperative management, and technical assistance), the trails program, the rivers program in four regions, and the urban
park and recreation recovery program are not adequately
staffed and funded to meet their objectives and be effectively
carried out within all seven regions. While it is not practical
or cost effective to administer these programs in seven regions,
administering them differently from the land and water
conservation fund could create a situation where the same state,
local, or federal official had to work with two different regions
on the same national recreation program.
### Table 19: National Recreation Program Workload Indicators, by Region, FY 1986

<table>
<thead>
<tr>
<th>Region</th>
<th>Total LWCF Projects</th>
<th>No. of States</th>
<th>Total Surplus Prop. Conveyed</th>
<th>6f(3) Conversions</th>
<th>No. of UPARR Cities</th>
<th>Total UPARR Projects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mid-Atlantic</td>
<td>6,227</td>
<td>14</td>
<td>264</td>
<td>100</td>
<td>124</td>
<td>365</td>
</tr>
<tr>
<td>Midwest</td>
<td>9,713</td>
<td>10</td>
<td>161</td>
<td>32</td>
<td>69</td>
<td>178</td>
</tr>
<tr>
<td>Southeast</td>
<td>5,330</td>
<td>10</td>
<td>118</td>
<td>40</td>
<td>67</td>
<td>191</td>
</tr>
<tr>
<td>Rocky Mountain</td>
<td>4,614</td>
<td>6</td>
<td>46</td>
<td>10</td>
<td>7</td>
<td>15</td>
</tr>
<tr>
<td>Southwest</td>
<td>3,301</td>
<td>5</td>
<td>92</td>
<td>29</td>
<td>44</td>
<td>96</td>
</tr>
<tr>
<td>Western</td>
<td>2,240</td>
<td>6</td>
<td>125</td>
<td>10</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Pacific Northwest</td>
<td>2,233</td>
<td>4</td>
<td>110</td>
<td>9</td>
<td>8</td>
<td>13</td>
</tr>
</tbody>
</table>

### Table 20: LWCF, UPARR, and Recreation Assistance Resources, by Region, FY 1986

<table>
<thead>
<tr>
<th>Region</th>
<th>LWCF/UPARR Funding ($000)</th>
<th>FTEs</th>
<th>Recreation Assistance Funding ($000)</th>
<th>FTEs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mid-Atlantic</td>
<td>$815</td>
<td>20.0</td>
<td>$80</td>
<td>2.5</td>
</tr>
<tr>
<td>Midwest</td>
<td>562</td>
<td>15.2</td>
<td>45</td>
<td>0.9</td>
</tr>
<tr>
<td>Southeast</td>
<td>438</td>
<td>11.0</td>
<td>41</td>
<td>2.0</td>
</tr>
<tr>
<td>Rocky Mountain</td>
<td>313</td>
<td>7.0</td>
<td>15</td>
<td>0.5</td>
</tr>
<tr>
<td>Southwest</td>
<td>284</td>
<td>5.3</td>
<td>30</td>
<td>0.6</td>
</tr>
<tr>
<td>Western</td>
<td>215</td>
<td>4.5</td>
<td>20</td>
<td>0.5</td>
</tr>
<tr>
<td>Pacific Northwest</td>
<td>240</td>
<td>4.1</td>
<td>30</td>
<td>1.0</td>
</tr>
<tr>
<td>Totals</td>
<td>$2,867</td>
<td>67.1</td>
<td>$261</td>
<td>8.0</td>
</tr>
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Role and Function of the Washington and Regional Offices

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Final Report

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As the nation's principal conservation agency, the Department of the Interior has basic responsibilities to protect and conserve our land and water, energy and minerals, fish and wildlife, parks and recreation areas, and to ensure the wise use of all these resources. The department also has major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

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GENERAL COMMENTS

1. Splitting up the natural resources functions will weaken the Park Service's ability to exercise cohesive leadership on natural resources issues and concerns. It weakens the ability of the Director to take a Servicewide perspective and initiate efforts to respond to national concerns (e.g., acid rain, biological diversity, inventory and monitoring, etc.). It also makes it more difficult to develop and implement the kind of long-range strategy called for as Point 1 of the 12 Point Plan ("Develop a long-range strategy to protect our natural, cultural, and recreational resources."")

2. As the outside world has increasingly infringed on park areas, on many natural resource issues, the Park Service must participate in national and international arenas in order to be effective in protecting park resources. This includes such things as participation in protection, research and data networks like the Man in the Biosphere Program; in the air quality arena structured by the Clean Air Act and managed by the regulatory structure of the Environmental Protection Agency and the States; and in the regulatory processes of BLM and the Forest Service which can have widespread effects on parks abutting those other Federal agency lands. This requires a more centralized, comprehensive, integrated structure which allows for the development of strategic approaches, includes the technical expertise to be credible participants, and provides the necessary data to be effective in these arenas. (We have finally awakened to the fact that emotional appeals without some scientific information is not working.)

3. There is not adequate analysis in the report to justify disrupting the three natural resources programs and there are no real criticisms of the operations of the programs. Any consideration of the organizational realignment of the natural resources programs should be preceded by a more thorough study of the functions and certainly should not occur before the completion of the $100,000 study of the NPS science functions called for in the House Appropriations Committee Report for FY 1988.

4. The task force did not include any members (as far as I can tell from the names) who have any real familiarity with the natural resources programs.

5. The task force has misperceived the nature of the program activities (elaborated on below) and overstated the degree to which they might be considered "operational"

6. The task force did not appear to consider either all of the possible organizational options or the disadvantages to their recommendations. For example, the task force did not consider the option of moving the WASO Air Quality, Water Resources, and Geographic Information Systems Divisions to Washington; did not evaluate the functions of the Water Resources Division Applied Research Branch and what would be required to create a "critical mass"; and did not apparently consider that moving the water resources staff and the few air quality staff members from Ft. Collins to Denver would effect the very useful relationship that those functions have with Colorado State University including space in university buildings, access to laboratories, faculty expertise, etc. In addition, it appears that the actual costs of such a move—disregarding
the disruption to the program, probable higher office space costs in Denver, and the benefits from proximity to CSU—are substantially underestimated. Ft. Collins is not within commuting distance of Denver. Household moves can cost anywhere from $2,000 to $90,000. Estimating $30,000/person to move 25 to 30 families would be $750,000 plus the costs of moving the offices themselves. (Note: We have also heard from at least one region that the Applied Research Branch is doing work of greater benefit to parks and regions than the Water Services Branch.)

7. The WASO Divisions referred to in the report as "WASO field offices" (p. 39) and "technical service centers" (p. 176) function as WASO Divisions. Each of them has a division chief reporting to the Associate Director and each of them has a staff representative in WASO (Molly Ross—Air Quality; Vic Berte—Water Resources; and Anne Frondorf has in her position description to serve as staff liaison for GIS). These divisions were established with most of their staff outside Washington, D.C. to satisfy the numbers game then going on to have more people "in the field" (defined as outside of Washington, D.C.). While being more centrally located geographically has had some advantages in performing the kind of mixed roles they have (technical assistance and consultation with parks and regions; participation in national, regional, and State proceedings; etc.), they have always functioned as WASO offices with responsibility for policies, priorities, coordination and technical support.

8. It does not make sense to transfer clearly natural resources programs from one arm of WASO (Associate Director for Natural Resources) to another arm of WASO (the Denver Service Center under the Associate Director for Planning and Development), especially the one for planning and development. Such a move could also be potentially embarrassing to the Director and Administration since it appears to diminish the organizational emphasis on natural resources.

9. Just as ecosystems are the result of the integration of all the natural resources components (air, water, plants, animals, etc.), we have been striving for more integration and closer working relationships among the program functions (e.g., acid rain research, geothermal), not fragmenting the subject matter and putting it under two Associate Directors.

10. All of this is not to say that our programs could not operate better. The report has made us take a hard look at how our programs could be operating better. We are looking at priority setting procedures, proposing to hold more group meetings with regional coordinators, and considering providing materials to each coordinator for a newsletter. We are prepared to make appropriate changes in programs.

11. These are productive, effective programs responding to the Director's and GAO's interest in assuring that funds are spent on the highest priority Servicewide needs.

12. The report represents a strong field bias to the detriment of the Service and System as a whole and fails to recognize current realities about the nature of natural resource threats and the expertise, techniques, and arenas by which they can most effectively be dealt with. Note especially Introduction: "field operations designed to serve the public and to protect the resources." (top of p. 2) Aren't all of the organizational components designed to serve the public and to protect the resources? "how the human and monetary resources available
to it can be most effectively put to work in support of field operations to meet the challenges of the future." (top of p. 3) Field operations cannot meet the challenges of air quality; it must be done through a Servicewide effort in the EPA regulatory process.

13. The task force report narrows the definition of the Washington Office role from the one we have worked, i.e. policies, priorities, coordination, and technical support, to "development of NPS policies, programs, regulations and procedures." (p. 9). Is this change being made from some reason?

14. There were some questions on the questionnaires both to the parks and the Regions asking about how they felt about the support they were getting from Air Quality, Water Resources, and GIS. There is no mention in the report about the results. (I will try to get some information on the results from Linda Kasinetz before you get back.)

15. The natural resources programs are organized to benefit the whole system not just individual parks. This is a new world for the Park Service and individual park managers are not going to be able to independently influence many of the impacts that are threatening their resources. First, they do not always have access to the right arenas and secondly, they probably cannot afford and may not need the wide range of technical expertise that will be effective in dealing with some kinds of threats (nuclear waste repository, coal mine in Canada, tar sands development on adjacent lands, dredging for a submarine base, etc.). But these are not the kinds of issues that a technical services branch of the Denver Service Center is likely to be very effective in dealing with.

16. What must be sought is a balance, a partnership between parks, Regions, and WASO. There are things that park managers are in a position to do best (e.g., informing the public, getting public and Congressional attention on individual park problems) and we want to encourage park managers to seek creative ways to address issues, but there are other things that individual parks cannot handle. WASO needs to help meet park needs and parks need to help meet System needs (e.g., data as part of a monitoring network).

POSSIBLE CRITICISMS AND RESPONSES

1. POLICY AND OPERATIONS SHOULD BE SEPARATE. Why? We believe there are strong benefits from a well integrated program where policy and operations support each other. For example, a number of policy issues have been addressed because the staff person who discovered an individual problem in a park discussed it with another staff person involved in policy who realized that this was a "generic problem" which could potentially effect other parks and should be handled through a broader policy recourse. (Example: loopholes in BLM regs which do not require permits for "small" coal operations and test sites which can significantly damage resources were discovered when providing technical assistance/consultation to New River; these are now being addressed generically.) On the other side of the coin, the policy positions only have influence when they are backed up by good information. The policy people would not be effective if they did not have the technical people and their data and expertise to draw on. The strategies put together by the policy staffs require interaction with the technical staffs to develop the kind of data that will credibly and effectively
support our positions. Also, this report talks about operations and policy but fails to recognize the integral role that science and research play in these functions.

2. NOT CONSISTENT WITH PRIMARY ROLE AND FUNCTION (p. 10). The task force has narrowed the WASO functions to "development of NPS policies, programs, regulations and procedures." WASO functions had previously been described as "policies, priorities, coordination, and technical support." These programs are easily within the latter function statement. Though they are admittedly something of an organizational hybrid for the NPS, the current structure makes good organizational sense when seen from a Servicewide perspective. Each of these program areas requires diverse expertise and a critical mass of that expertise to interact in problem-solving. The unusual degree of "centralization" of these functions is required because there is not enough expertise to go around and these activities benefit from a Servicewide perspective. Defining the roles and organizational structure of these Divisions requires recognition of the partnership between WASO, Regions and parks.

3. NOT PART OF PRIORITY SETTING SYSTEM. Reality is a hierarchy of priorities—park, region, Service, Department, and Congress. The natural resources programs have attempted to follow the pattern of the DSC planning and construction priority setting process. Because of the relatively small amounts of money available and the level of expertise required to argue for projects and consider options and priorities, meetings to develop priorities have been held with regional representatives rather than Regional Directors. For each of the functions, a multi-year Servicewide priority list both for project funding and technical assistance has been compiled with regional input and coordination. The programs have attempted to be responsive to regional priorities but must work within such constraints as staff capabilities and time commitments; Congressional direction (e.g., put monitors in all class 1 areas); and Systemwide needs and opportunities (e.g., participation in visibility networks, National Acid Deposition Program, data collection for regulatory process, etc.). This again requires carefully balancing the needs of the System and the needs of the needs of individual parks. (Note: This is not to say that that balance is always in perfect equilibrium and should not be periodically reevaluated.)

4. LACK OF ACCOUNTABILITY TO LINE MANAGEMENT. These programs report to the Associate Director for Natural Resources and are accountable to the Director and Congress. They have a good record of productivity and effectiveness and try hard to be responsible to specific park needs. However, for the most part, they are not operations programs in that most of their functions do not relate to "running a park." Therefore, they should be accountable to the Director and should operate to support "line management" as he sees appropriate.

5. NOT RESPONSIVE TO PARK AND REGIONAL NEEDS. We try to balance meeting park specific needs with the needs of the System/Servicewide needs. Sometimes this may mean that we are not responsive to individual park needs. For example, many parks want air quality monitoring equipment. Such equipment is very expensive and should be located to provide the data needed to most effectively participate in the decisions being made
under the Clean Air Act. Similarly, water rights work priorities must be set with an understanding of the adjudications taking place across the Service. Furthermore, it must be recognized that on-going commitments often consume substantial amount of project money. Also, program direction must be considered. For example, the GIS program objectives are to build GIS data bases that are multi-functional for park management. Therefore, projects that are for one specific application and will not have long-term utility (and are therefore less cost-effective) are lower priority.

6. NOT CLOSELY ENOUGH TIED TO PLANNING. The natural resources divisions have made a particular concerted effort to work more closely with planning activities. To this end, staff has served on planning teams for GMPs (Big Cypress) and implementing plans (Water Resource Management Plan for Glen Canyon); data has been provided for planning and environmental documents; training and briefing sessions have been held with DSC staff; staff has participated in planning training sessions; and comments have been provided on individual planning documents in the review process.

7. SUPERVISION TOO DISTANT. The NPS is an organization that by its nature must function on a very dispersed basis. The Office of the Associate Director for Natural Resources and the WASO divisions located primarily in Colorado have taken a number of steps to overcome the lack of physical proximity and to minimize problems in coordination with Washington and other divisions. Such steps include liaison people in Washington (Molly Ross-Air Quality; Vic Berte-Water Resources; and Anne Frondorf-GIS) and linking of computer systems to print out in Washington memos, etc. drafted in Colorado. In addition, magnafax capability and FTS communications are readily available for quick consultations. Furthermore, the Division chiefs are responsible GM-14 and 15 program managers who do not require close immediate supervision.

8. NEED MORE COORDINATION. There has probably never been an organization that thought it had enough coordination. We try--monthly reports, training sessions, periodic meetings, etc. We need guidelines and plan to make a significant start on those this year. We work very hard to coordinate recognizing the benefits of this relatively labor intensive activity. We can only try to do better. Who in the Service is perceived as doing better?

9. NO CRITICAL MASS IN APPLIED RESEARCH BRANCH. This is asserted but there is no discussion of what would constitute a critical mass or what the functions of this branch are that will be lost. The Branch disputes the lack of critical mass assessment and cites that work it is doing which benefit a variety of parks. At least one region thinks that the work of this branch is more valuable to the parks that the work of the Water Services Branch which provides direct technical support in locating potable water supplies, dealing with erosion, etc. We think this function deserves more analysis and perhaps should be augmented rather than eliminated.

10. NPCA'S ACID RAIN REPORT SHOWS PROBLEMS. The acid rain report was prepared to try to encourage amendments to the the Clean Air Act. The problems it describes existed prior to 1986 when the information was prepared but many of them have been addressed since then (e.g., single acid rain coordinator, participation on NAPAP task groups). The report does not deal with the Servicewide air quality program; there is a disclaimer
in the front of the report saying that it does not examine the Service's Air Quality Program in general.

OPTIONS

1. Status quo.

2. Study possibility of technical service center or some other organizational structure reporting to the Associate Director, Natural Resources.

3. Study other options.

The most vulnerable functions are the Water Services Branch of the Water Resources Division, GIS, and, possibly, the Water Rights function. All of these functions are directly responsive to park and regional needs. However, GIS does have some Servicewide roles and capabilities (e.g., GIS standards, interaction and representation of NPS on the Interior Department Computer Coordinating Committee considering GIS standards, and possible Servicewide applications and data bases). Water Rights involves work with parks, regions, Assistant Secretary's office, Solicitor's office, the Department of Justice and individual states. I think because of this need for interaction within NPS and outside, its location in WASO is appropriate.

P.S. Why wasn't any consideration given to moving Natural Landmarks to Natural Resources (not that we actually may want it) or moving mining and minerals back to natural resources? And what in the world does the Office of Operations Engineering have to do with resources at all?
Subject: Thoughts on the NPS organization report relating to natural resources

Several points for your consideration:

(1) We should organize to carry out our basic mission, which is stated well in Ted Sudia’s recent white paper: manage resources, educate the public (on the national park ethic and the issues), and provide resource-compatible recreation. Our job in natural resources must be to foster the knowledge, skills, and attitudes needed to maintain the natural processes responsible for the continuing evolution of each park’s biological diversity. This requires a systems approach based on an understanding of the past, contemporary, and likely future effects of human activities on park ecosystems. It requires the combined capabilities of natural and social scientists, as virtually every major natural resource issue has social, economic, or cultural implications. It requires new technologies. And it requires unprecedented cooperation between scientists, resource managers, interpreters, and administrative personnel working in parks, regions, and WASO, as well as with other agencies, organizations, and nations. More integration, more cooperation should be the cornerstone of our effort.

(2) We should organize to deal with the natural resource issues we face, both natural and man-caused. Increasingly the most serious are regional, even planetary in scope. External land use changes and related loss of habitat and biological diversity. Management of wide-ranging animals. Air quality and acidic deposition. Sea level rise. Climate change. All of these issues require strategic planning at the WASO and regional office levels. None can be addressed by field managers alone. All require integrated, long-term approaches in inventory, monitoring, research, and management. All require external cooperation, often involving agencies and institutions with regional (e.g., TVA), national (e.g., NSF, EPA) or global areas of concern (e.g., NASA, NOAA). All require us to encourage use of NPS areas to generate the information needed by those who must take action to address them. These types of problems require Servicewide or multi-region direction, and are generally
the least responsive to the traditional NPS bottom-up programming approach. Park-based planning, or even park-region planning, which may work well for issues largely confined by park boundaries, virtually guarantees missed opportunities on these critical issues. There needs to be a WASO-region-park partnership in which WASO establishes policies and priorities at the national level, the regions coordinate the participation of the park units, and the parks provide logistical support or carry out activities themselves and make sure these priorities also are reflected in their RMPs. We must be willing to organize so we can take advantage of major national and international programs, like the National Acid Precipitation Program (due to end in FY1990) and the International Geosphere-Biosphere Program, which aims to improve perspective on global change. These programs are important not only because they generate long-term data sets essential for coordinated efforts to solve macro-scale problems, but also because they also provide basic resource information of immediate practical usefulness to the manager.

(3) The proposed reorganization comes just at the time when the Service is planning important new strategic initiatives on long-term monitoring and biological diversity, as well as to strengthen Servicewide interpretation on air quality, biodiversity and other macroscale issues. These will involve research and technical personnel in AQD, WR, and GIS divisions, as well as under the Senior Scientist and on your staff. I believe that the proposed restructuring of Natural Resources will make it much more difficult to initiate and sustain these initiatives, for the following reasons:

- I’ve always been a fan of DSC—began my NPS career there. However, I feel DSC is not a suitable unit for coordinating strategic, long-term research and development programs requiring national direction, as it operates pretty much strictly as a service to the parks.

- The limited justification does not explain how the new organization will improve coordination among natural resource program components; between policy, programs, and operations; and between Natural Resources and outside institutions. My guess is that responsiveness to needs perceived by the parks could conceivably improve, but at the sacrifice of capability to develop coordinated ways to deal with the big natural resource issues.

- The big issues will need more funding and personnel, as well as commitment, at all levels for I&M and interdisciplinary R&D. I don’t see how the proposed DSC division could improve the competitive edge for these activities, particularly those that support development of national policies or contribute to national priorities.
-The research staff of WASO divisions includes respected authorities in a number of fields. The integrity of their R&D programs should be maintained. It's not in the NPS interest to divert this talent toward "collateral" duties (e.g., preparing NEPA documents)—which I believe would be more likely in a DSC division.

-Our AQD, WRD, and acid deposition programs benefit from the interaction of NPS and CSU specialists. Relocating these employees to Denver would adversely affect several key research programs.

-The report mentions the importance of the WASO policy role, but diminishes the ability of the A/D Natural Resources to do this by reassigning three divisions. The report is silent organizational changes which could strengthen this role. Some possibilities:

- establish an integrated WASO ecosystem resources program as a single unit to focus on the strategic issues. Its components: biodiversity, long-term ecological monitoring, ecosystem research (including watershed studies), strategic synthesis to support natural resource policy, MAB, special designations (including natural landmarks, RNA's, biosphere reserves, etc.), national/international coordination (e.g., NAPAP), endangered species, IPM, WASO liaison with interpretation, natural resources policy review of NPS plans and programs. Humans should be considered as part of the ecosystem, and the social science program also brought within this framework. Professional capabilities for these functions are presently distributed through 001-social science (part), 424-natural landmarks; 479-Applied Research Branch; 473; 474-MAB/acid rain; and the Cal-Davis CPSU. The as-yet-to-be established Vegetation and Wildlife Division would overlap in some of these areas; under the DM role and function it will be hard to establish a strategic and unique mission for this division.

- strengthen role of internal coordinating bodies, such as the Technical Coordinating Committee on Atmospheric Pollution in Park Ecosystems

- establish/restructure CPSUs and interinstitutional cooperatives (e.g., Southern Appalachian Research and Resource Management Cooperative, Virgin Island Resource Management Cooperative) to provide support for addressing specific issues of bioregional or Servicewide concern

- increase use of Schedule A appointments to improve NPS access to professional capabilities for addressing priority resource issues